

103971



REPORT OF THE
COMPTROLLER GENERAL
OF THE UNITED STATES



Hindrances To Coordinating
Transportation Of People
Participating In Federally
Funded Grant Programs
Volume I

GAO identified 114 Federal programs that provide financial assistance for the transportation of people. GAO did not identify any express statutory or regulatory restrictions that specifically prohibit coordination of transportation resources of these programs, but did identify a number of hindrances to coordination.

The most significant hindrance appears to be confusion at all government levels about the extent of transportation coordination for federally funded projects and agencies. The Comptroller should reduce this confusion by clarifying and coordinating transportation programs and projects, and by establishing a program to provide transportation assistance to project sponsors.

U34201



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-180575

To the Chairman and Ranking Minority
Member
Committee on Environment and Public
Works
United States Senate

This report responds to your request concerning hindrances to coordinating federally funded programs that provide for transportation of people. Although we found no express legal restrictions to coordinating this transportation, we did find hindrances. We believe our recommendations to the Congress and to the Office of Management and Budget, set forth on page 55, will help alleviate some of the problems experienced in attempts to coordinate.

As agreed with the Committee office, we plan to send copies of this report to the Office of Management and Budget; the Interstate Commerce Commission; the 11 departments and agencies whose programs we discuss in the report; interested Committees and Members of Congress; and Federal, State, and local officials.

A handwritten signature in dark ink, appearing to read "G. K. ...".
Acting Comptroller General
of the United States

COMPTROLLER GENERAL'S
REPORT TO THE SENATE
COMMITTEE ON ENVIRONMENT
AND PUBLIC WORKS

HINDRANCES TO COORDINATING
TRANSPORTATION OF PEOPLE
PARTICIPATING IN FEDERALLY
FUNDED GRANT PROGRAMS

D I G E S T

Over the years, the Congress has passed legislation establishing over 1,000 programs that include funds for such activities as health, education, employment training, vocational rehabilitation, food and nutrition, housing, and transportation. Generally, funds for these purposes are in the form of categorical grants to State and local governments or nonprofit organizations. (See ch. 1.)

During hearings in 1975, the Senate Committee on Public Works ^{1/} became concerned about the lack of coordination of transportation services being offered in rural areas. The Committee concluded that a detailed review was warranted and requested GAO to identify

--Federal programs that provide for the transportation of program beneficiaries,

--any restrictions that frustrate Federal, State, and local efforts to coordinate these various transportation resources, and

--instances in which coordination has been achieved and the circumstances that made this possible. (See app. I.)

GAO identified 114 Federal programs that provide transportation for program beneficiaries. With a few exceptions, these programs do not distinguish among rural areas, small urban areas, and urban areas. Therefore, the report does not set programs serving rural and small urban areas apart from those serving urban areas. Instead it discusses programs that provide for the transportation of people in general.

Estimates of fiscal year 1976 transportation costs were available for 68 of these programs.

^{1/}Now the Senate Committee on Environment and Public Works.

CED-77-119

Estimates included \$1.9 billion for 10 programs administered by the Department of Transportation and \$308 million for 58 other programs. (See app. II and p. 7.)

GAO did not find any express statutory or regulatory restrictions specifically prohibiting coordination of transportation, but one Federal program did have a policy limiting vehicle sharing to a specific target group. However, GAO identified a number of hindrances to transportation coordination efforts:

--Problems inherent with the categorical grant approach to Federal assistance.

--Grantee worries about the availability of continuous funding.

--Incompatibility or perceived incompatibility due to differences in client groups (age, income, and so forth) and differences in transportation needs of client groups.

--Concern that coordination is not beneficial or that clients may be adversely affected by coordination.

--State transportation regulations.

--Accountability, paperwork, and bookkeeping problems.

--Lack of a concerted Federal effort to coordinate transportation.

However, the most significant hindrance is confusion at all governmental levels about the extent of coordination federally funded projects may engage in. (See ch. 4.)

It is not clear under what circumstances and to what extent the Congress endorses the use of transportation resources (personnel, vehicles, operating expenses, etc.) acquired for one program to support the transportation activities of another program. Federal legislation

generally is silent regarding transportation coordination or cost sharing. (See pp. 24 to 25.)

Government-wide regulations are of little help to executive agencies and Federal grantees in coordinating transportation. Few Federal program regulations mention transportation coordination and offer little real coordination guidance to grantees. (See pp. 27 to 28.) However, GAO case studies and studies by others indicate that despite these and other hindrances, some coordination is taking place. (See p. 37.)

Strong local leadership appears to play an important role in successful coordination activities. (See p. 39.) Projects that only provide transportation appear to be able to avoid many real or perceived hindrances to coordination because they are in fact vendors of services with which most human services agencies can contract. However, as the case studies indicate, hindrances exist even in these arrangements. (See p. 54.)

A number of solutions have been suggested on how to eliminate various hindrances to transportation coordination. GAO believes that many are not administratively feasible or practical at the present time. Although a number of the problems hindering coordination might be resolved or reduced through administrative or legislative actions, GAO did not explore the impact of these actions on other aspects of the programs. (See p. 54.)

Coordination of various federally funded transportation resources is desirable, providing there is appropriate cost-sharing and cost and service accountability. Therefore, some general recommendations are made so that projects desiring to engage in transportation coordination will be aware of the circumstances in which coordination is permissible and the procedures that must be followed to insure equitable cost sharing and appropriate accountability.

RECOMMENDATIONS TO THE CONGRESS AND TO
THE OFFICE OF MANAGEMENT AND BUDGET

One of the fundamental hindrances to coordinating federally funded transportation resources appears to be the lack of a clearly defined congressional intent about the use of program resources to benefit persons other than designated program beneficiaries and the need for and extent of reimbursement for any inter-program use of resources. The Congress should reduce this confusion by endorsing transportation coordination among various Federal programs and federally funded projects when feasible, providing--as previously stated--there is appropriate cost-sharing and cost and service accountability. (See p. 55.)

Consistent with the Congress' endorsement of transportation coordination, GAO recommends that the Director of the Office of Management and Budget:

- Issue regulations that provide clear guidance to grantees concerning permissible sharing of grantee transportation resources and reimbursement procedures when a project or program provides transportation for beneficiaries of another grantee or program.
- Provide guidance on allocating property costs among federally funded projects when such property acquired by one project is also used by other projects.
- Direct heads of Federal departments and agencies to assist the Office of Management and Budget in developing administratively workable regulations. (See p. 55.)

AGENCY COMMENTS

GAO solicited comments from the 11 Federal departments and agencies as well as from the Office of Management and Budget and the Interstate Commerce Commission. (See p. 56.)

The Office of Management and Budget did not agree with GAO's recommendations because it was not convinced that a transportation coordination problem exists. (See p. 56.) On the other hand, the Community Services Administration criticized the report for not showing a greater sense of urgency about the coordination problem. (See p. 58.)

The Department of Health, Education, and Welfare believed that implementing GAO's recommendations, particularly the one to the Congress, would be premature until the results of the Department's Human Services Transportation Demonstration Program are available. The Department believed that the most significant barrier to a working commitment to transportation coordination is lack of knowledge about the real benefits to be derived from transportation coordination or consolidation. (See p. 57.)

ACTION endorsed the concept of transportation coordination among various federally funded projects when feasible. (See p. 58.)

The Appalachian Regional Commission said that as a matter of policy, it has promoted service consolidation for its projects. (See p. 58.)

The Department of Transportation concurred with the recommendation to the Congress but concluded that it would be helpful if heads of Federal agencies would also endorse the concept. (See p. 58.)

Most of the other departments and agencies were concerned with methods of implementing coordination or the need for more or improved transportation rather than the need for congressional endorsement of the transportation coordination concept. (See pp. 58 to 60.)

GAO's report was not designed to test or prove the benefits of coordination or to

determine the best process to achieve coordination. Neither the report nor its recommendations are meant to be an endorsement of mandatory coordination. The report's general recommendations are intended to insure that grantees desiring to share transportation resources and services with other grantees be aware of the circumstances in which transportation coordination is permissible. (See p. 57.)

C o n t e n t s

		<u>Page</u>
DIGEST		i
CHAPTER		
1	INTRODUCTION	1
	Coordination of Federal	
	transportation activities	2
	Scope of review	4
2	INVENTORY OF FEDERAL PROGRAMS PROVIDING	
	TRANSPORTATION FOR PEOPLE	6
	Cost of providing transportation	7
	Nature of the programs identified	
	Primary Federal funding source	8
3	SUMMARY OF CASE STUDIES AT 12 LOCATIONS	14
	Appalachian Ohio Regional Transit	
	Association (AORTA)	15
	Community Action Program, Belknap-	
	Merrimack Counties, Inc. (BMC)	15
	Chelan-Douglas Council on Aging (COA)	16
	Delaware Authority for Specialized	
	Transportation (DAST)	16
	Fare Free Transportation System	17
	Older Adults Transportation	
	Service, Inc. (OATS)	17
	Progress for People Human Resource	
	Agency (PPH)	18
	Roanoke Agencies Dial-A-Ride System	
	(RADAR)	18
	Senior Citizens Transportation, Inc.	
	(SCT)	19
	Transportation Remuneration Incentive	
	Program (TRIP)	20
	Valley Transit District (VTD)	20
	Washington County	21
4	COORDINATION ISSUES	22
	Hindrances to coordination	22
	Successful coordination	37
	State and Federal efforts to coordinate	
	transportation	40
	Suggestions to eliminate hindrances	48

CHAPTER		<u>Page</u>
5	CONCLUSIONS AND RECOMMENDATIONS	53
	Conclusions	53
	Recommendation to the Congress	55
	Recommendations to the Director of the Office of Management and Budget	55
	Agency comments and our evaluation	56
APPENDIX		
I	Letter dated November 12, 1975, from the Chairman and Ranking Minority Member of the Senate Committee on Public Works	61
II	Inventory of Federal programs that provide for transportation of people	63
III	Congressional committees with an interest in programs that provide transportation for program beneficiaries	92
IV	Letter dated May 25, 1977, from the Director, ACTION	107
V	Letter dated June 8, 1977, from the Federal Cochairman, Appalachian Regional Commission	110
VI	Letter dated June 9, 1977, from the Director, Community Services Administration	115
VII	Letter dated August 3, 1977, from the Inspector General, Department of Health, Education, and Welfare	121
VIII	Letter dated May 31, 1977, from the Assistant Secretary for Community Planning and Development, Department of Housing and Urban Development	125
IX	Letter dated May 20, 1977, from the Program Audit Manager, Office of Audit and Investigations, Department of the Interior	127

APPENDIX		<u>Page</u>
X	Letter dated May 24, 1977, from the Assistant Attorney General for Administration, Department of Justice	128
XI	Letter dated May 27, 1977, from the Assistant Secretary for Administration, Department of Labor	129
XII	Letter dated May 16, 1977, from the Administrator, Small Business Administration	131
XIII	Letter dated July 1, 1977, from the Assistant Secretary for Administration, Department of Transportation	133
XIV	Letter dated June 21, 1977, from the Administrator of Veterans Affairs, Veterans Administration	138
XV	Letter dated May 3, 1977, from the Chairman, Interstate Commerce Commission	140
XVI	Letter dated June 9, 1977, from the Deputy Director, Office of Management and Budget	142

ABBREVIATIONS

AORTA	Appalachian Ohio Regional Transit Association
ARC	Appalachian Regional Commission
BMC	Belknap-Merrimack Counties, Inc., Community Action Program
COA	Chelan-Douglas Council on Aging
CSA	Community Services Administration
DAST	Delaware Authority for Specialized Transportation
DOL	Department of Labor
DOT	Department of Transportation

FMC	Federal Management Circular
FRC	Federal Regional Council
GAO	General Accounting Office
HEW	Department of Health, Education, and Welfare
HUD	Department of Housing and Urban Development
ICC	Interstate Commerce Commission
OATS	Older Adults Transportation Service, Inc.
OMB	Office of Management and Budget
PFP	Progress for People Human Resource Agency
RADAR	Roanoke Agencies Dial-A-Ride System
SCT	Senior Citizens Transportation, Inc.
TRI-MET	Tri-County Metropolitan District of Oregon
TRIP	Transportation Remuneration Incentive Program
VA	Veterans Administration
VTD	Valley Transit District

GLOSSARY

CETA	Comprehensive Employment and Training Programs titles I, II, and VI of the Comprehensive Employment and Training Act of 1973, as amended (29 U.S.C. 801 <u>et seq.</u>).
Community Action Program or CSA funds	Community Action, Community Services Act of 1974 (formerly the Equal Opportunity Act of 1965) title II, sections 212 and 221 (42 U.S.C. 2790 <u>et seq.</u>).
Community Development Block Grants	Community Development Block Grants/Entitlement Grants, title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301-5317).
Foster Grandparents	Foster Grandparents, Domestic Volunteer Service Act of 1973, title II (42 U.S.C. 5001-5023 (Supp. V, 1975)).

Head Start Child Development--Head Start, title V of the Community Services Act of 1974 (42 U.S.C. 2921 et seq.).

Medicaid Medical Assistance Program, title XIX of the Social Security Act, as amended (42 U.S.C. 1396 et seq.).

RSVP Retired Senior Volunteer Program, Domestic Volunteer Service Act of 1973, title II (42 U.S.C. 5001-5023 (Supp. V, 1975)).

Section 3 Capital Improvement Grants, section 3, Urban Mass Transportation Act of 1964, as amended (49 U.S.C. 1602).

Section 147 Rural Highway Public Transportation Demonstration Program, Federal-Aid Highways Act of 1973, as amended, section 147 (23 U.S.C. 142).

Section 16(b)(2) Capital assistance to private, nonprofit organizations, section 16(b)(2), Urban Mass Transportation Act of 1964, as amended (49 U.S.C. 1612).

Title III State Agencies Activities and Area Planning and Social Service programs, title III of the Older Americans Act of 1965, as amended (42 U.S.C. 3001 et seq.).

Title VII Nutrition Programs for the Elderly, title VII of the Older Americans Act of 1965 (42 U.S.C. 3045).

Title XX Social Services for Low-Income and Public Assistance Recipients, title XX, part A of the Social Security Act, as amended (42 U.S.C. 1397).

Vocational Rehabilitation Rehabilitation Services and Facilities--Basic Support Program, Rehabilitation Act of 1973, as amended (29 U.S.C. 701).

BLANK

CHAPTER 1

INTRODUCTION

Over the years, the Congress has passed legislation establishing many Federal programs that make funds available for the transportation of people. Generally, such funds are in the form of categorical grants given to State and local governments or other nonprofit organizations.

Most programs providing transportation do so as a support service to enable programs to deliver their primary services effectively. These human services programs function to help people achieve self-sufficiency. Their services include health, education, employment training, vocational rehabilitation, food and nutrition, and housing. These programs, such as the Department of Health, Education, and Welfare's (HEW's) Nutrition Program for the Elderly, Head Start, and Medicaid, are available in urban and rural areas.

Other programs administered by the Department of Transportation (DOT) provide transportation as their primary objective and fund either transportation equipment or operating expenses for that equipment.

Some programs are geographically restrictive. For example, the Urban Mass Transportation Administration's Formula Grant Program (section 5) is available only for urban areas. In contrast, the Rural Highway Public Transportation Demonstration Program (section 147) is available only for rural and small urban areas.

During hearings in 1975, the then Senate Committee on Public Works became concerned about the lack of coordination of transportation services being offered in rural areas of the United States. Several witnesses commented at the hearings that there was a need for greater coordination among Federal programs providing transportation services in rural areas and a surprisingly large number of programs providing such service, and that there were Federal laws and regulations that inhibited or precluded coordination of individual rural transportation programs at the local level.

In November 1975 the Committee concluded that a detailed review was warranted and requested us to:

- Identify all Federal grant and assistance programs that make Federal funds available for the transportation

of people in rural and small urban areas and between these and urban areas.

- Determine what restrictions, if any, there are on the use of Federal funds under each identified program and whether such restrictions are imposed explicitly by the authorizing legislation or by administrative interpretation of such legislation.
- Determine the extent to which the aforementioned restrictions frustrate Federal, State, and local efforts to provide coordinated transportation service.
- Identify instances in which coordination has been achieved and the circumstances which have made this possible.
- Make recommendations for eliminating Federal restrictions that hinder coordination of transportation programs.

It became evident during our review that with a few exceptions, Federal programs discussed in this report do not distinguish among rural areas, small urban areas, and urban areas in carrying out their programs. Therefore, the report does not distinguish between programs that serve rural and small urban areas and those that serve urban areas. Instead it discusses programs that provide transportation in general.

COORDINATION OF FEDERAL TRANSPORTATION ACTIVITIES

Federal programs other than those in DOT generally provide transportation as a support service to the program's primary goal. Each program's local projects typically provide transportation for their clients without considering the transportation resources of other federally funded projects in the area. This is illustrated by the following theoretical example once given in similar form by an HEW official. The Smith family--Granny Joyce, her daughter Mary, and her granddaughter Sarah--live in the same household in rural Maine. Each is eligible under different Federal programs for transportation services. One medical center serves the community. A Head Start center is located two blocks from the medical center. On any given day, a Head Start van picks up Sarah and drives past the medical center on its way to the Head Start center. Later in the morning a van serving elderly citizens picks up Granny Joyce to take her to the medical

center. A few minutes later a van providing transportation to welfare recipients picks up Mary to take her to the same medical center.

An alternative to this fragmented transportation approach is for federally funded projects to coordinate their transportation services within a specific area. We have defined transportation coordination as the pooling or sharing of transportation resources by several different recipients of Federal funds from more than one categorical program. In this context, transportation resources refer to all transportation facilities and expenditures that are eligible for Federal funding, including personnel, vehicles, vehicle operating expenses, and administrative and maintenance facilities.

Coordination could be achieved through a formal or informal arrangement whereby federally funded transportation providers could jointly engage in a wide range of activities, such as planning, sharing facilities and equipment, disseminating information, providing backup vehicles, and contracting for service.

Although it seems logical to assume that many benefits could be derived from such coordinated transportation activities, we did not attempt to evaluate their efficiency because such an effort was beyond the scope of this review. However, a May 1976 House Select Committee on Aging report entitled "Senior Transportation--Ticket to Dignity," stated that the potential for more efficient services to the elderly and handicapped through coordinated use of the same vehicles, staffs, facilities, and budgets needs no substantiation. The report stated that it was axiomatic that centralized dispatching, maintenance, and administration represent important potential savings in the use of resources.

The November 1976 report of the Institute of Public Administration ^{1/} entitled "Coordinating Transportation for the Elderly and Handicapped," stated that through cooperative efforts, operating and fixed-cost savings can occur. Operating-cost savings are associated with more efficient purchasing of parts and supplies, centralized maintenance, and more effective use of capacity through more efficient use of labor, such as dispatching and scheduling. Fixed-cost savings are associated with eliminating duplicative facilities, equipment, and

^{1/}The Institute of Public Administration is a private, non-profit organization that performs studies and evaluations for local, State, or Federal Government agencies.

management and administrative costs. This report also stated that many project operators viewed expansion of passenger capacity as a method to achieve coordination, while others viewed it as a potential benefit of coordination.

SCOPE OF REVIEW

Our review encompassed four major activities:

- Identifying Federal programs that provide transportation for program beneficiaries and hindrances to coordinating such transportation.
- Developing 12 case studies on transportation projects to identify hindrances to coordination and circumstances under which coordination was achieved.
- Reviewing various studies relating to transportation of people, particularly transportation provided by various human services programs and coordinating such transportation.
- Discussing transportation coordination issues with knowledgeable Federal, State, and local officials.

We did not attempt to measure any cost-benefit aspects of transportation coordination or the process by which the Federal Government might implement coordination.

We interviewed program officials knowledgeable of each of the 1,026 programs in the 1976 Catalog of Federal Domestic Assistance ^{1/} issued by the Office of Management and Budget (OMB) in May 1976.

We also interviewed officials responsible for a number of programs not in the catalog or that were combined with programs in the catalog. We surveyed applicable legislation, regulations, and other documentation relating to programs that provide transportation to program beneficiaries.

^{1/}The catalog is a comprehensive listing and description of Federal programs and activities that provide assistance or benefits to the American public. The May 1976 edition includes 1,026 programs administered by 54 different Federal departments, independent agencies, commissions, and councils.

While developing the case studies, we interviewed (1) local transportation project officials and reviewed project records, (2) officials of other federally funded projects in the area that provide transportation for clients, (3) local community officials, regional planning officials, and State officials responsible for transportation planning, (4) State officials responsible for administering Federal programs funding the local transportation projects, and (5) other local, regional, State, and Federal officials to obtain information regarding each transportation project.

We also reviewed a number of related studies sponsored by HEW and DOT. These include four studies by the Institute of Public Administration that deal with transportation for the elderly and coordination of transportation, a George Washington University study that includes an inventory of Federal programs providing transportation for people, a DOT study on rural transportation, and an HEW Region IV study that lists Federal programs providing transportation for people. These studies are discussed in more detail beginning on page 46.

CHAPTER 2
INVENTORY OF FEDERAL PROGRAMS PROVIDING
TRANSPORTATION FOR PEOPLE

We identified 114 programs that provide transportation for people. (See app. II.) These programs are administered by 11 Federal departments, independent agencies, and commissions--HEW, Department of Housing and Urban Development (HUD), Department of the Interior, Department of Justice, Department of Labor (DOL), DOT, Appalachian Regional Commission (ARC), Community Services Administration (CSA), Small Business Administration, Veterans Administration (VA), and ACTION. Sixty-eight of the programs (57 percent) are administered by HEW, and most of the transportation funds we could identify were being spent by 10 programs in DOT.

We have excluded from this inventory most programs that support only research and development activities; student loan programs; scholarships and fellowships; Department of Agriculture loan programs; staff training programs; and commissions such as the Ozark Regional Commission, the New England Regional Commission, and the Old West Regional Commission. Although these programs theoretically could provide funds for transportation, they were excluded because some of them, such as the regional commissions and the agricultural loan programs, never have provided it and others would provide it only in unique situations. They do not provide funds for ongoing transportation services. We have also excluded programs such as Social Security benefits because payments are made directly to individuals without restrictions on use of these payments by the beneficiary. In various instances the military services provide transportation between residential areas and Government installations for military staff and their dependents, including school children. This transportation has been excluded because it is limited to military personnel and their dependents.

Also, we have excluded compensation programs such as Federal Employees Compensation and Longshoremen's and Harbor Workers' Compensation. These programs provide travel costs to beneficiaries to go to reconsideration hearings and proceedings before administrative law judges. Usually these are one-time trips, and the potential to coordinate with other federally funded projects is minimal.

COST OF PROVIDING TRANSPORTATION

For fiscal year 1976 we were able to obtain transportation expenditures, actual or estimated, for only 68 of the 114 programs we identified, including the 10 programs in DOT. In fiscal year 1976 the DOT programs spent \$1.9 billion for transportation. The other 58 programs spent an estimated \$308.1 million for program beneficiary transportation, which represents 1.7 percent of their total obligations. For these 58 programs that could provide transportation cost estimates, separate estimates for rural, small urban and urban areas were almost nonexistent.

We believe that the \$308.1 million underestimates the true amount spent yearly on transportation even in the 58 programs because not all transportation service costs are included in estimates.

For example, under HEW's title XX program, which provides social services to welfare recipients, not all States identify transportation as a service in their social services plans; therefore, some States report no expenditures on client transportation to HEW. This does not mean that social services agencies are not providing transportation to clients. Often case workers transport their clients, but HEW has no information on the cost of this transportation. Therefore, the cost data HEW gave us underestimates transportation costs of this program.

We obtained estimated transportation costs for fiscal year 1976 from program officials, budget staffs, and consultants. Some program officials, such as those at DOT, were able to give us actual transportation expenditures. However, most other program officials could provide only rough estimates because neither Federal, State, nor local sponsors were always required to account separately for transportation expenditures. If they did collect such information, they were not required to collect it uniformly. Furthermore, program officials for 46 programs were not able to develop even rough guesses of how much was being spent on transportation. To obtain actual costs, Federal agencies would have to require all grantees to report transportation expenditures as a separate expense item.

In most programs we identified, transportation was a secondary or support service to help clients travel to the primary services. For example, the Head Start program provides transportation to Head Start centers where children are given educational, nutritional, and health services. The

Retired Senior Volunteer Program (RSVP) can transport its clients to volunteer sites. Because transportation was not the programs' primary service, Federal agencies tended not to ask local project sponsors to identify transportation costs as separate line items on budgets or expenditure reports. These costs were considered part of the total program cost. For some programs--Medicaid, Maternal and Child Health programs, vocational educational programs, the Retired Senior Volunteer Program, and most Comprehensive Employment and Training programs--agency officials could not even estimate transportation costs. To obtain this information, transportation costs would have to be developed at the local project level.

In some instances we obtained various estimates for the same program. For example, one HEW official estimated that 10 percent of title III funds for human services to older Americans was being spent yearly on transportation services. However, cost estimates for HEW's Administration on Aging prepared by the Institute of Public Administration, which were based on actual surveys of State administrations on aging, showed that about 15 percent of title III project funds were spent on transportation in fiscal year 1975. For fiscal year 1976, some HEW officials believed that 17 percent was a reasonable estimate. However, fiscal year 1976 reports indicate that 25 percent of the funds were used for transportation. HEW and the Institute of Public Administration estimates for the title VII Nutrition Program for the Elderly varied from 4 to 6 percent. Not all States were able to provide transportation data.

NATURE OF THE PROGRAMS IDENTIFIED

Programs we identified as providing transportation to clients are generally categorical grant programs. That is, they are grants-in-aid directed at narrow objectives or specifically defined needs. Categorical grants provide resources for specific purposes as long as certain minimum national standards contained in agency guidelines and regulations are followed. A few of the programs, such as HUD's Community Development Block Grants and DOL's Comprehensive Employment and Training Programs, are block grants. They are similar to categorical grants in that funds are awarded for specific purposes on the basis of an application or plan setting forth the intended use of funds. They differ, however, in that block grants have more broadly or functionally defined purposes than categorical grants. Block grants place greater reliance on State and local initiative and administrative machinery.

Categorical and block grants are distributed one of two methods--formula or discretionary. Formula grant funds are distributed among all eligible recipients on the basis of a formula that is usually prescribed in the authorizing legislation and that considers either population, numbers of low-income residents, fiscal capacity of recipient governments, or a combination of these. Usually, a State plan showing compliance with certain legislative requirements is all that is needed to obtain formula grants, which are then often passed on to local jurisdictions.

In contrast, discretionary grants require prospective grantees to submit specific project proposals to Federal agencies which, in turn, review and select proposals with the most merit. Discretionary grants are awarded to help solve specific problems and are not distributed to recipients according to any fixed proportions.

Both categorical and block grant programs provide transportation to clients in a variety of ways:

- Reimbursement to clients for use of their private automobiles or for taxicab fares. Some programs that use this procedure are HEW's Vocational Rehabilitation Program, CSA's Senior Opportunities and Services Program and Community Food and Nutrition Program, VA's Veterans Outpatient Care and Veterans Nursing Home Care, and ACTION's Retired Senior Volunteer, Foster Grandparents, and Senior Companions Programs.
- Transportation chips or tokens are given to clients. Some State Medicaid and title XX agencies use administrative funds to pay for bus tokens. HEW's Maternal and Child Health projects, HEW's programs for older Americans, such as the title III and title VII programs, and ACTION programs are among those which have given tokens to clients.
- Transportation is purchased through contracts between the sponsoring agency and another organization. Many of the programs just mentioned use this method.
- Transportation is provided directly by the project through the purchase and operation of vehicles. Many programs administered by HEW's Public Health Service, its Office of Education, ACTION, and CSA allow projects to develop their own transportation systems.

- Program or project staff provide transportation. Case workers may drive welfare clients to human services. Staff such as outreach workers or job counselors in WSA's community action programs, DOL's Comprehensive Employment and Training Act programs, and HEW's family planning projects and community health centers may drive their clients to needed services.
- Transportation is provided by volunteers who may get reimbursed for mileage. ACTION programs; HEW's alcohol, drug abuse, and mental health programs; Medicaid; and many human services programs use volunteers.

PRIMARY FEDERAL FUNDING SOURCES

We identified the following programs as the ones frequently paying for transportation services in our case studies.

Catalog of
Federal Domestic
Assistance number

Program title

Common name (note a)

13.600	Child Development--Head Start	Head Start
13.624	Rehabilitation Services and Facilities--Basic Support	Vocational Rehabilitation
13.633	State Agencies' Activities and Area Planning and Social Service programs	Title III
13.635	Nutrition Program for the Elderly	Title VII
13.714	Medical Assistance Program	Medicaid or Title XIX
13.771	Social Services for Low-Income and Public Assistance Recipients	Title XX
14.218	Community Development Block Grants/ Entitlement Grants	Community Development Block Grants
17.232	Comprehensive Employment and Training Programs	CETA
20.500	Urban Mass Transportation Capital Improvement Grants	Section 3
49.002	Community Action	Community Action Program or CSA funds
72.001	Foster Grandparents Program	Foster Grand- parents Program
72.002	Retired Senior Volunteer Program	RSVP
Not assigned	Rural Highway Public Transportation Demonstration Program	Section 147
Not assigned	Capital Assistance to Private Non- profit Organizations	Section 16(b)(2)

a/Throughout this report we refer to these programs by their common names.

We found that Federal programs most frequently funding local transportation projects or whose locally funded projects were coordinating transportation in some manner were usually those that had transportation as their goal or that funded transportation as a vital support service.

For example, the purpose of the section 3 program is to acquire, construct, or improve mass transit facilities; the purpose of the section 16(b)(2) program is to provide transportation equipment for elderly and handicapped people. Federal programs such as Head Start and title III, which view transportation as a vital support service, fund local projects that often have their own vehicles and take groups of clients to the same places on a fairly regular basis. Hours of vehicle use and routes are well established. For example, a Head Start project may use its vehicles for 2 or 3 hours a day, 4 days a week. The vehicles may not be in use at other times. Other projects may then use the vehicles during idle hours or have their clients ride at the same time Head Start clients are on board. The potential for coordination is evident.

Federal programs that show less potential for coordinating transportation seem to be those that do not fund transportation projects per se; they do not establish and pay for the administration, operation, and capital costs of vehicles. Rather than provide transportation directly, they reimburse clients for use of their own automobiles or for taxicab fares or use project staff to transport clients. Transportation is provided on an individual, unscheduled basis, often to destinations that vary from trip to trip.

For example, the Employment Service Program will provide transportation to job interviews. Since these interviews are set up individually, coordination with other human service transportation does not seem to be feasible. A number of VA programs, such as Community Nursing Home Care, Veterans Domiciliary Care, and Veterans Outpatient Care, also provide transportation to clients on an individual, as needed basis, often by reimbursement. Coordination with other human service transportation providers is unlikely.

Some programs provide unique transportation that would make coordination with other Federal transportation providers unlikely. The Runaway Youth Program may provide transportation to send youths back home. This may include paying for plane or bus fare. The Emergency Medical Service and Childhood Lead-Based Paint Poisoning Control Programs provide emergency transportation service to hospitals, doctors' offices, or clinics.

Many Federal program officials indicated that coordinating transportation provided by their respective programs' projects was not feasible because of the uniqueness of the service. Thus, while we identified 114 Federal programs that provide transportation to clients, we do not believe that they all have the potential to coordinate or consolidate this service.

CHAPTER 3

SUMMARY OF CASE STUDIES AT 12 LOCATIONS

We developed transportation case studies at 12 locations in an attempt to identify instances in which coordination has been achieved, the circumstances which made it possible, and any hindrances to it. We considered projects to be coordinated if they pooled or shared transportation resources with other recipients of Federal funds for transportation. Transportation resources refer to funds used for transportation, dispatching service, project staff, maintenance garages, and vehicles.

Little coordination existed in several of our case study locations. We looked at places such as Washington County, Oregon; Wenatchee, Washington; and central New Hampshire to find out why coordination has not occurred and to determine if hindrances to coordination differ from those in coordinated systems. We included the Transportation Remuneration Incentive Program in West Virginia because of its unique approach to meeting transportation needs of the general public and elderly and handicapped persons. In selecting the 12 transportation case studies, we considered

- geographic location in order to include a number of different States and standard Federal regions;
- population density of service area, rural versus urban;
- type of project, that is, human services agencies that transport clients or organizations that are exclusively transportation providers;
- scope of operations, including size of service area, extent of funding, and ridership;
- sources of direct and indirect Federal funding;
- nature of service provided, that is, demand-responsive, fixed-route, flexible-fixed-route, contract, or charter.

The following is a summary of each case study. Details on each case are provided in Volume II.

APPALACHIAN OHIO REGIONAL TRANSIT
ASSOCIATION (AORTA)

AORTA is a public transportation provider operating in southeastern Ohio. The population of AORTA's planned service area is 193,000. AORTA has 10 vehicles which are used to provide fixed-route, flexible-fixed-route, contract, demand-responsive, and charter service. However, most of its service is on a fixed-route basis. Estimated ridership in calendar year 1976, based on actual ridership during January through June 1976, was 164,400. During 1975 and 1976 AORTA received Federal funding through the Appalachian Regional Commission, section 16(b)(2), section 147, title VII, revenue sharing, CETA, and ACTION's Mini-Grant Program.

AORTA evolved from transportation services provided to the rural elderly and disadvantaged by the Tri-County Community Action Agency. The agency formed AORTA to administer transportation services because it believed that a broad-based public transportation system could maintain transportation service better than a federally dependent system and a public bus system would avoid the stigma of a "poor people's bus system." AORTA provides transportation to the general public as well as contract service to clients of a senior nutrition program and a county welfare program. There is little coordination between AORTA and other social service programs providing transportation because of AORTA's image as a fixed-route system serving the general public and some social service program officials think its contract rates are too high. AORTA began a 3-year expansion program in 1976. Among other things, AORTA plans to (1) extend its present one-county, demand-responsive service into a seven-county area and (2) solicit social service agencies for contract service agreements.

COMMUNITY ACTION PROGRAM BELKNAP-MERRIMACK
COUNTIES, INC. (BMC)

BMC is the primary antipoverty agency and social service provider for 2 of New Hampshire's 10 counties. These two central New Hampshire counties--Belknap and Merrimack--had a 1970 population of 113,292. BMC provides transportation for its Head Start, title XX, title III, vocational rehabilitation, and community action activities. It had 16 vehicles and an estimated ridership of 48,600 in calendar year 1976. BMC provides fixed-route, flexible-fixed-route, and demand-responsive transportation services. During 1975 and 1976 BMC received Federal funds through CSA, Head Start, section

16(b)(2), title XX, title III, Community Development Block Grant, and Vocational Rehabilitation Programs.

BMC is a social service agency that provides transportation to its clients primarily as a means of carrying out its own missions. It has not developed a fully coordinated or integrated transportation system. Although BMC applied for a section 147 grant in March 1976 to further the coordination and consolidation of federally assisted transportation in the two counties, the application was not approved. Therefore, BMC's coordination with other agencies was limited to a contract to provide transportation for a day care center.

CHELAN-DOUGLAS COUNCIL ON AGING (COA)

COA provides several services, including transportation, for the elderly in the Wenatchee, Washington, area. This area had a population of about 26,000. COA has five vehicles providing service to the elderly in the area on a demand-responsive and flexible-fixed-route basis. Its ridership in calendar year 1976 was 26,398. COA received Federal funds for 1975 and 1976 through title III, title VII, section 16(b)(2), CETA, and RSVP.

COA does not operate a coordinated transportation system; it does not coordinate its services with other Federal programs providing client transportation. Furthermore, COA officials believe that their clients would not benefit from transportation coordination.

DELAWARE AUTHORITY FOR SPECIALIZED TRANSPORTATION (DAST)

DAST is a statewide transportation authority created by Delaware to meet basic transportation needs of the elderly, handicapped, and poor. The State's total population was 574,692. DAST uses its 38 vehicles to provide demand-responsive service. Its estimated ridership during calendar year 1976 was 167,000. DAST received Federal funds during 1975 and 1976 through revenue sharing, the Community Action Program, title III, title VII, title XX, section 3, Medicaid, and the Vocational Rehabilitation and VA Outpatient Care Programs.

DAST evolved from a nonprofit corporation created by several human services agencies to provide specialized transportation service. The nonprofit corporation had a problem of financial insecurity, and various agency officials concluded that a public authority would be more desirable than a

private agency. Although DAST is providing transportation to 35 social service agencies on a reimbursable basis, it receives State funds to assure continuity of operations.

FARE FREE TRANSPORTATION SYSTEM

The Fare Free Transportation System is the main social service transportation provider in Cape May County, New Jersey. It provides service to the elderly, poor, and handicapped throughout the county, which has a population of 64,295. The Fare Free System uses 10 vehicles to provide demand-responsive and fixed-route service. Its estimated calendar year 1976 ridership was 84,000. The Fare Free System received Federal funds in 1975 and 1976 through title III, title XX, and the Vocational Rehabilitation Program.

Fare Free is a coordinated transportation system. It grew out of the creation of a traffic department within the county government. Fare Free provides transportation service to elderly clients of the Area Agency on Aging and to clients of the State Division of Vocational Rehabilitation. Fare Free also has a purchase-of-service contract with the State for title XX clients. In addition, Fare Free fosters cooperation by supplementing the transportation services of other human services agencies.

OLDER ADULTS TRANSPORTATION SERVICE, INC. (OATS)

OATS is nearly a statewide transportation system for the elderly and handicapped in Missouri. Although OATS is considered a statewide system, as of August 1976 it operated in only 90 of Missouri's 114 counties. These 90 counties had a population of 3,098,312.

As of August 1976 OATS had 73 vehicles that it used to provide demand-responsive and flexible-fixed-route service. Its estimated ridership expressed in one-way trips for calendar year 1976 was 507,665. OATS' Federal funding sources during 1975 and 1976 were title III, title XX, the Regional Medical Program 1/, and section 16(b)(2).

OATS is a coordinated transportation system. The OATS program started with support from the Missouri Office of

1/A Public Health Service program whose authorization expired June 30, 1974. Project funds, however, were available during 1975 and 1976.

Aging to develop a consolidated transportation program across the State. It is now providing transportation services to several different recipients of Federal funds. Also, other agencies are providing office space for OATS, taking phone calls, and identifying potential OATS members.

OATS also engages in other coordination activities, such as contracting with a taxi company and arranging for a Retired Senior Volunteer Program to supplement its services. However, OATS' charter, which is limited to serving only the elderly and handicapped, has precluded OATS from considering coordination with systems serving other client groups.

PROGRESS FOR PEOPLE HUMAN RESOURCE AGENCY (PPF)

PPF provides several social services in the Southeast Tennessee Development District, one of nine such districts in the State. The district has a population of 420,417. PFP provides transportation to social service clients as well as the general public. However, persons of age 50 and older, the poor, and the handicapped are given preferential treatment for transportation. PFP operates 27 vehicles and provides fixed-route and demand-responsive service. Ridership (expressed in the number of destinations for each passenger) for calendar year 1976 was 87,658. PFP's Federal funding sources for 1975 and 1976 were title III, CSA, the Regional Medical programs, section 147, and CETA.

PPF is a coordinated transportation system because it not only serves its social service clients and the general public but also provides contract service to two county boards of education, a Vocational Rehabilitation Program, and a Child Development Program. Also, PFP and a county health department provide each other with reciprocal transportation services. In addition, there are some social service agencies in the area that do not have money to provide transportation for their clients. These agencies sometimes ask PFP to pick up a client who is having difficulty getting transportation. Generally, PFP will transport these individuals.

ROANOKE AGENCIES DIAL-A-RIDE SYSTEM (RADAR)

RADAR provides transportation services to human services agency clients, primarily elderly, handicapped, and poor persons. It operates in the southwest Virginia counties of Roanoke, Craig, Botetourt, and Allegheny, which have a total population of 241,433. RADAR has 13 vehicles that are used to provide flexible-fixed-route service. Estimated ridership in calendar year 1976 was 106,000. RADAR received

Federal funds during 1975 and 1976 through the Foster Grandparents Program, RSVP, title VII, title XX, and CETA.

RADAR is a coordinated transportation system that was developed through a cooperative effort of local government and human services agencies with State legislation serving as the catalyst. The State legislation established a pilot program aimed at promoting coordination among social service agencies for aspects common to each agency. Roanoke area human services agencies in turn selected transportation as the common aspect that would demonstrate coordination of their programs. RADAR was created by consolidating transportation resources of two of three major human service transportation providers in the area. The third major human service provider originally took a wait-and-see attitude, but an agreement was reached whereby this agency's vehicles and drivers were to be transferred to RADAR in the fall of 1976.

SENIOR CITIZENS TRANSPORTATION, INC. (SCT)

SCT provides transportation services to senior and handicapped citizens throughout Rhode Island, which has a population of almost 1 million. It had 56 vehicles and provided an estimated 340,774 rides in calendar year 1976. SCT provides demand-responsive, fixed-route, and flexible-fixed-route service. In 1975 and 1976 SCT's Federal funding sources were section 16(b)(2), title III, and Model Projects on Aging. Agencies that purchased transportation service from SCT received Federal funds from title XX, Community Development Block Grants, ACTION's Senior Companion Program, revenue sharing, and the Vocational Rehabilitation Program.

SCT is a coordinated transportation system mainly because of the determination of the State Division on Aging to coordinate its clients' transportation needs. After a study recommended that all transportation operations should be centralized and handled directly by SCT, the division told community action agencies that had been providing service to the elderly that it would no longer give them funds to operate the vehicles.

SCT has met in joint planning sessions with the Rhode Island Public Transit Authority to establish eventual feeder service to intercity transit routes for senior and possibly handicapped passengers. However, coordination with agencies serving clients other than the elderly and handicapped is limited because SCT transports only elderly and handicapped people.

TRANSPORTATION REMUNERATION INCENTIVE PROGRAM (TRIP)

TRIP, established to improve transportation services for the elderly and handicapped, is a statewide demonstration project in West Virginia. It uses discounted transportation tickets to subsidize transportation costs for low-income elderly and handicapped persons in West Virginia, which has a population of between 1.7 million and 1.8 million. It is also trying to establish a statewide public transportation network. As of November 1976 this transportation network had 38 vehicles providing fixed-route service in 3 of West Virginia's 10 transportation regions.

TRIP's Federal funding sources during 1975 and 1976 were CSA funds, various Urban Mass Transportation Administration funds, section 147, and title III.

TRIP is not a coordinated transportation system as it does not pool or share the transportation resources of other federally funded recipients. Moreover, it plans to provide regularly scheduled public transportation with fixed routes separate from those already provided by the social service organizations.

VALLEY TRANSIT DISTRICT (VTD)

VTD is a public transportation provider in Connecticut's Lower Naugatuck Valley. The Valley, consisting of four municipalities, had a 1975 population of 75,100. VTD used its 17 vehicles to provide fixed-route, demand-responsive, contract, and charter service. Calendar year 1976's estimated ridership, based on January through May, was 139,584. VTD's direct and indirect Federal funding sources for 1971 through 1976 were title III; title VII; title XX; the Vocational Rehabilitation Program; CETA; and the Urban Mass Transportation Administration's section 3, demonstration, and Formula Grant Programs.

VTD is a coordinated transportation system providing services to 20 social service agencies. The Lower Naugatuck Valley Community Council--created in 1969 to plan, coordinate, and establish programs in human services agencies' activities--is partly responsible for VTD's development. The council identified transportation as a major problem and, with the assistance of regional planning and State officials, sponsored legislation that led to the establishment of VTD.

VTD leases other vehicles when demand creates the need or when VTD's own vehicles are inoperable. It also subcontracts jobs to other transportation providers when it cannot meet the needs of valley residents. For example, VTD may subcontract with a school bus operator to transport a group of senior citizens.

WASHINGTON COUNTY

We studied four projects in Washington County, Oregon, which have received Federal funds for transportation. The largest of the four projects in this county, which has a population of about 190,000, is the Tri-County Metropolitan Transportation District of Oregon (Tri-Met). Tri-Met, a public transit system, operates in the city of Portland and two other Oregon counties besides Washington County. Tri-Met operates nine routes in Washington County on a fixed-route basis. Its estimated Washington County ridership for calendar year 1976 was 5,067,648, and its Federal funding source during 1975 and 1976 was the Urban Mass Transportation Administration.

The three other Washington County Transportation projects are the Forest Grove Senior Center, the Community Senior Center of Hillsboro, and Special Mobility Services, Inc. These projects provide demand-responsive service to the elderly and to a lesser extent the handicapped. They have fleets ranging from two to five vehicles. The cumulative estimated ridership for the three projects in calendar year 1976 was about 65,000 riders. The projects received Federal funds during 1975 and 1976 from title III, title VII, revenue sharing, CETA, and section 16(b)(2).

Washington County has no coordinated transportation system; however, attempts are being made to coordinate some transportation services. For instance, Tri-Met was exploring various methods for coordinating the funding and operation of special transportation services.

CHAPTER 4

COORDINATION ISSUES

We did not find any express statutory or regulatory provisions specifically prohibiting the coordination of transportation services among Federal programs. Some local level coordination is taking place. Our case studies showed that these programs jointly fund transportation projects or fund separate projects that work out their own cooperative arrangements.

However, hindrances to coordination exist. The categorical approach to Federal assistance, a lack of knowledge of existing community transportation services, confusion about the legality of sharing resources and serving diverse client groups, and a general lack of concern about coordinating transportation resources, have all hindered coordination. At the Federal level, some agencies and offices have taken interest in this issue, specifically the Office of Human Development in HEW and DOT. However, no concerted effort has been made at any level of government to provide the leadership necessary to eliminate hindrances to coordinated transportation where it is feasible and desirable.

HINDRANCES TO COORDINATION

We identified only one Federal program--Retired Senior Volunteer Program (RSVP)--that has a policy that limits its coordination potential. Several other Federal programs with policies that limited coordination have changed them.

According to officials of ACTION (the Federal agency responsible for RSVP), before May 1975 national RSVP policy stated that its vehicles could be used only for RSVP. Since that time RSVP policy has allowed other Federal programs for older Americans and other ACTION programs in the community to use RSVP vehicles under cost-sharing arrangements. According to ACTION headquarters officials, programs that are not for older Americans or are not ACTION programs cannot use the vehicles. However, one of the transportation projects we contacted told us that ACTION's Office of General Counsel gave it permission to use RSVP vehicles to transport Head Start children.

Two HEW regional offices had policies restricting the use of Head Start vehicles. In August 1974 HEW's Region IV office issued an instruction that vehicles purchased with Head Start grant funds could be used only for Head Start

purposes. In September 1975 this policy was modified so that, with the approval of the regional office, the vehicles can be used by others if the user is assessed a mileage rate to cover full operating costs. Also, in June 1974 HEW's Region X office issued a policy denying the use of Head Start vehicles for any purpose except Head Start but rescinded it in October 1975. This regional office does not require prior approval of coordination but does require that a daily mileage rate must be charged to cover all operating costs.

During fiscal year 1975, the Urban Mass Transportation Administration said that section 16(b)(2) projects could use their vehicles only for the elderly and handicapped; however, this policy changed for 1976. The new procedures stated that the vehicles "may be used by other social service institutions or the general public if such use is incidental to the primary use of the vehicles by elderly and handicapped persons."

Although we found no other Federal statutes, regulations, or policies that specifically prohibited coordination, hindrances do exist. They fall under several different categories: (1) the nature of Federal assistance, (2) uncertainty of authority to coordinate, (3) administrative problems, (4) funding problems, (5) incompatibility of client needs and client characteristics, (6) concern that coordination is not beneficial, (7) State transportation regulations, and (8) lack of a concerted Federal effort to coordinate.

Nature of Federal assistance programs

There are inherent coordination problems with the categorical approach to Federal assistance. Coordination among programs is difficult because of the sheer number of assistance programs administered by various Federal agencies. Categorical programs are generally developed to serve specific target groups, such as the elderly, poor, or handicapped, rather than to serve some functional purpose.

Programs with similar purposes or functions have fragmented administration at Federal, State, and local levels. Furthermore, programs with similar target groups are often administered in fragmented fashion. For example, RSVP and the Foster Grandparents Programs serve similar clients and purposes. To be eligible for the Foster Grandparents Program a person must be at least 60 years old and meet poverty guidelines. To be eligible for RSVP a person must be at least 60 and retired. Persons eligible for these programs may also be eligible for title III and title VII services.

If the elderly are at the poverty level, they may also be eligible for the Community Food and Nutrition Program funded by the Community Services Administration and the title XX program, which may provide meals.

Although these six programs all serve the elderly, they are administered by four different Federal agencies and can be administered by different organizations at either the State or local level. This means that a project director wanting to coordinate these programs has to be concerned with six different sets of regulations, guidelines, policies, fiscal accountability and reporting requirements, and Federal officials. Because title III, VII, and XX programs are formula grant programs administered by State agencies, each State may impose additional policies and guidelines.

Furthermore, eligibility requirements in most categorical programs, such as age, income, and physical and mental incapacity, are perceived by program personnel to be barriers to coordination. Almost all Federal programs we identified as providing transportation serve specific target groups. Some local project staff believe that no one but the specific target group should ride that project's vehicles.

Uncertainty of authority to coordinate

It is not clear under what circumstances and to what extent the Congress has endorsed the concept of a grantee of any Federal program furnishing transportation to meet the needs of persons other than those designated as program beneficiaries. Although some Federal laws provide for coordination, the language is general and vague. With the exception of the Older Americans Act of 1965, as amended, the laws that mention coordination do not specifically mention transportation coordination.

Two acts--the Developmental Disabilities Services and Facilities Construction Act (42 U.S.C. 6001 et seq.), as amended, and the Older Americans Act of 1965, as amended--mention other programs with which to coordinate, but it is not clear whether coordination is to be restricted to those programs specifically mentioned. Furthermore, these laws do not mention cost sharing. The Older Americans Act of 1965, as amended, the Developmental Disabilities Services and Facilities Construction Act, as amended, the Rehabilitation Act of 1973, as amended, and title XX of the Social Security Act, as amended, all contain some provisions calling for some type

of intergovernmental or interagency cooperation. Specifically, the Rehabilitation Act of 1973, as amended, requires that State plans for vocational rehabilitation services provide for entering into cooperative arrangements with and using the services of other social service programs. The Older Americans Act of 1965, as amended, states that Federal agencies funding programs with similar purposes to aging programs should cooperate with HEW's Administration on Aging. Further, the act states that funds appropriated under titles III and VII can be pooled with funds made available for transportation services under the Rehabilitation Act of 1973 and titles VI, XIX, and XX of the Social Security Act.

The Developmental Disabilities Services and Facilities Construction Act, as amended, states that State plans must provide for the maximum use of all available community resources. The act mentions nine Federal programs that must be taken into account when State plans describe services for the developmentally disabled. Title XX of the Social Security Act, as amended, states that State services programs must include a description of how the provision of title XX services will be coordinated with other human services plans, such as Medicaid and Child Welfare services.

Government-wide regulations are also vague. On July 30, 1976, OMB issued Circular No. A-110 to establish uniform administrative requirements for grants and other agreements with institutions of higher education, hospitals, and other nonprofit organizations. The circular, effective January 1, 1977, established property management standards including the following requirement:

"Shared use - During the time that nonexempt, non-expendable personal property is held for use on the project or program for which it was acquired, the recipient shall make it available for use on other projects or programs if such other use will not interfere with the work on the project or program for which the property was originally acquired. First preference for such other use shall be given to other projects or programs sponsored by the Federal agency that financed the property; second preference shall be given to projects or programs sponsored by other Federal agencies. If the property is owned by the Federal Government, use on other activities not sponsored by the Federal Government shall be permissible if authorized by the Federal agency. User charges should be considered if appropriate."

Although the above language might be interpreted otherwise, an OMB official advised us that OMB's intent was to require a grantee to share such property among programs or activities that it sponsors. The official told us that OMB did not intend to require sharing between different grantees and that he was not aware of any Government-wide regulation regarding sharing property among grantees.

Under the circular, the requirement to share appears to be mandatory--not permissive. However, sharing is required only " * * * if such other use will not interfere with the work on the project or program for which the property was originally acquired." The circular does not provide any guidance as to what constitutes interference or who is to determine that shared use would interfere with the work on the grant for which the property was acquired.

A similar circular, Federal Management Circular (FMC) 74-7, provides for uniform administrative requirements for grants-in-aid to State and local governments. In November 1976 OMB proposed revising FMC 74-7 to contain language on sharing similar to that in Circular A-110.

It appears to us that neither the Congress nor OMB have provided sufficient guidance to Federal grantor agencies and grantees regarding the appropriateness of sharing equipment among Federal grantees.

In commenting on the report, OMB said that we have given two different viewpoints about their regulations which they find difficult to reconcile.

OMB pointed out that we had raised questions regarding the proposed revision to FMC 74-7. The revision contained provisions which, according to the OMB comments, were to encourage grantees to share equipment on all Federal projects. OMB believed that our questions, raised in a February 1977 letter to the agency, were inconsistent with conclusions in this report that OMB has not yet provided sufficient guidance to Federal agencies and grantees regarding sharing equipment.

We pointed out in the February letter that while we did not disagree with the concept of getting maximum practicable use of each unit of nonexpendable property through sharing, we did question whether congressional intent had been established. We suggested that OMB discuss the shared-use concept with the appropriate congressional committees and seek legislation specifically authorizing it. We concluded that assuming

the Congress accepted the shared-use concept, there were some problems with the regulation, such as:

--Shared use is directed if it "will not interfere with the work on the project or program for which the property was originally required." Who decides what is interference? If it is the manager of the project that acquired the property, does the other manager have the right of appeal? To whom?

--The shared-use paragraph is vague about the extent of sharing. We pointed out that it could be interpreted to mean direct sharing among all programs in need of a particular piece of property. However, OMB officials advised us that the intent was to limit sharing to programs administered by a single grantee. We contrasted this limited intent with the Older Americans Act sharing provisions which clearly applied to multiple grantees. (See pp. 24 and 25.)

--We also stated that there may be costs associated with use of the property, including operating, maintenance, and perhaps indirect costs. The regulation does not mention cost sharing, and unless costs are shared properly, one program may be augmented at the expense of another.

In summary, because OMB's sharing requirement is (1) unclear regarding who determines whether sharing will interfere with the objectives of the program that owns the property and (2) vague about the extent of sharing and silent about cost sharing, we must conclude that OMB has not provided sufficient guidance on the subject. In addition, the question of whether congressional intent has been established remains unresolved.

Nevertheless, some program regulations attempt to deal with the coordination issue. For example, regulations on transportation for elderly and handicapped persons issued jointly by DOT's Urban Mass Transportation Administration and Federal Highway Administration provide for a minimal degree of coordination of the urban transportation planning process with nonmass transit providers of transportation. Specifically the regulations state that

"Governmental health and welfare agencies and private nonprofit organizations spend substantial sums each year to provide or purchase transportation for their clients, and these resources as well as any

reduced fare local taxi service should be considered for inclusion in a local coordinated plan."

Some program guidelines encourage or require coordination. For example, the general program provisions issued by HEW for its Special Services for Disadvantaged Students Program encourage coordination whenever feasible. Guidelines for the section 16(b)(2) program require that the responsible State agency develop State-level agreements and procedures to assure adequate coordination with social service agencies and other organizations providing community transportation and that, to the extent feasible, applicants for section 16(b)(2) funds coordinate the planning and operation of special services for elderly and handicapped persons with interested agencies.

However, neither these guidelines, the joint planning regulations, nor the laws mentioned above describe how this coordination should be done. These declarations encourage coordination but do not provide a mechanism for implementing it. The lack of guidance from the Congress and OMB contributes to the apparent lack of Federal guidance in transportation coordination and appears to be a basic cause of the concern and confusion on the part of grantor agencies and grantees about whether grantees may use vehicles acquired by one program to meet the transportation needs of other programs.

Administrative problems

Even if the Congress were to support the use of vehicles acquired by one program to meet the transportation needs of another program, there remains the question of reimbursement. This question relates to the general principle that grant funds be used only for the purpose for which the grant was made. This principle in turn can affect one Federal grantee's ability to subsidize the transportation needs of another grant program. The Federal grant statutes and regulations we reviewed, however, offer little help in clarifying for grantees whether reimbursement by the purchasing grantee should equal the transportation costs (including depreciation) incurred by the selling or servicing grantee. Similarly, it is not clear whether one grantee may make a profit by selling transportation services to another grantee. In our opinion, these questions, together with the general principle discussed above, should be central considerations in the formulation of any comprehensive legislative endorsement of transportation sharing among Federal grant programs.

We identified only one example of human services legislation that specifically addresses the question of reimbursement. Title V of the Community Services Act of 1974 amended the Head Start and Follow Through legislation and directed the Secretary of HEW to establish policies and procedures to insure that indirect costs attributable to the common or joint use of facilities and services by Head Start and Follow Through programs and other programs be fairly allocated among the various programs that use such services. HEW interpreted this to mean that projects should share costs (without distinguishing between direct and indirect costs). A Head Start official told us that under HEW's regulations to implement this requirement, projects that use Head Start-owned vehicles must pay a fair share for gasoline, repairs, drivers' salaries, and depreciation.

The Head Start official was not able to reconcile HEW's requirement for purchasing agencies to pay their fair share for the use of vehicles with regulations prohibiting the inclusion of depreciation as a project expense. FMC 74-4 prescribes cost principles applicable to grants and contracts to State and local governments, and HEW cost-principle regulations apply to nonprofit organizations. Both prohibit, as an eligible project expense, the cost or any portion of the cost of buildings and equipment donated or paid for directly or indirectly by the Federal Government.

However, an official in HEW's Division of Grants Policies and Regulations Development believed that the prohibition does not apply when one Federal program grantee purchases services from the grantee of another Federal program and the payments from the purchasing program are treated and accounted for as income to the grant project of the providing organization. The official believed that, in effect, the two programs were sharing the cost of the equipment.

FMC 74-4 also provides for identifying the total cost of services and allocating the cost to users. If the provider program charges the user program less than the total cost of the service, the provider program is subsidizing the user program's transportation activities. On the other hand, if the provider program charges the user program more than its total cost, the provider program may be making a profit at the user program's expense. ^{1/} Finally, if the provider program

^{1/}Neither FMC 74-4 nor HEW's cost principles provide guidance for profit or other increment above cost.

avoids both the subsidy and profit situations by charging the user program the total cost, including depreciation on federally funded equipment, the provider's action could be inconsistent with governing grant-cost principles.

To determine the actual costs of providing transportation, the provider would need an accounting system to identify all costs incurred in providing such transportation. The provider must also be able to allocate such costs to various users on a passenger-mile or passenger-trip basis or whatever method is required by the Federal funding agency. This becomes more complicated when clients of several programs are transported on the same vehicle at the same time and further complicated when clients are eligible for transportation service by several different programs (for example, title III and RSVP) which have contracted with the provider. In addition, all of the programs participating, either as provider or user, are subject to audit and concerned about accountability.

The complexity of the reimbursement situation, the fear of audit or, more precisely, the fear that funds spent for support services will subsequently be disallowed as a reimbursable project expense, and the confusion as to the intent of the Congress appear to discourage federally funded projects from trying to coordinate transportation.

Another administrative problem we noted resulted from paperwork requirements imposed on grantees. Extensive paperwork and associated bookkeeping to meet accountability requirements seem to present hindrances that discourage attempts to coordinate. This is particularly true of the title XX program.

The problem of cost allocation must be faced by any project that wants title XX funding. Title XX agencies often purchase service from providers under cost reimbursement contracts. Not only must a transportation provider be able to relate service provided to a specific client, it must also be able to determine the costs of the service. Small rural transportation projects simply may not have the resources to do this. One project director told us that it would be too difficult for him to determine the actual cost of providing transportation on a per-passenger-trip or per-passenger-mile basis so that he could negotiate a contract with the title XX agency. He had no need to develop this kind of accounting system in the past.

Various local project directors and State officials told us that title XX requires too much red tape and paperwork.

For example, every 6 months someone must determine client eligibility for title XX services. To meet accountability requirements many State title XX agencies have created burdensome paperwork. One transportation project director told us that he would not enter into a title XX agreement because he would have to hire another clerk to carry out the paperwork involved. A director of a housing authority that had a title XX contract to provide transportation decided not to renew the contract because he believed that the burden of keeping track of whether those riding his vehicle were title XX clients was too great.

Another problem under title XX is client eligibility for services. Self-determination for eligibility is allowed as well as local welfare office determinations of title XX client eligibility for transportation services. This was done for OATS and AORTA. However, in some places the transportation provider is responsible for documenting an individual's income in order to determine eligibility.

We believe that if officials in small, unsophisticated projects perceive that administration work will increase substantially because of coordination, they may decide coordination is not worth the effort.

We were told the section 16(b)(2) program, administered by State agencies, creates administrative burdens. Some States have imposed their own restrictions on program operations that inhibit coordination. One project operator responding to an Institute of Public Administration survey (see p. 46) complained that his State Department of Transportation required section 16(b)(2) projects to record every trip and every passenger riding a vehicle. The operator said that his volunteer drivers would quit if they had to maintain such detailed information. Officials of some projects claimed that State officials allowed section 16(b)(2) projects to purchase only one type of vehicle even though needs differed. We found that Washington State officials allow section 16(b)(2) projects to limit their services to either the elderly or the handicapped, although the Federal law says that the program is for both the elderly and the handicapped. Furthermore, although the procedures are presently in dispute, Washington State officials have required that projects obtain a certificate of public convenience and necessity from the State public utilities commission. Although Urban Mass Transportation Administration guidelines permit section 16(b)(2) vehicles to be used incidentally by client groups other than the elderly and handicapped, the certificate of public convenience and necessity did not allow this.

Funding problems

Problems such as lack of funds, difficulty obtaining matching funds required for Federal programs, and different funding cycles make coordination difficult. Because programs providing transportation operate under different Federal grant statutes and different Federal agencies, planning and funding cycles differ. An RSVP project director wanting to purchase transportation from a title III project may not know how much money will be available for the next program year at the time the title III project is planning its program because of different funding cycles. Thus it becomes difficult to budget a coordinated operation.

Most grantees are funded yearly and are not certain what amount they will get each year, if they get refunded. Also, some Federal programs will fund one project for only a limited period. For example, title III program regulations limit funding to 3 years per project unless a waiver is obtained from the Commissioner on Aging. Furthermore, an Administration on Aging official told us that title III funds cannot be substituted for existing financial resources. According to an ARC official, the Commission funds projects for only 5 years because its programs are intended to be short-term demonstration and feasibility efforts. The OATS general manager has found that other programs are reluctant to pool vehicles with or rely on a project that may not be assured of a continual funding source.

Most Federal programs that we identified as providing transportation services allow funds to be used for either capital or vehicle-operating costs. However, some do not allow funds to be used for both kinds of expenses. For example, the section 16(b)(2) program, which is a primary funding source for vehicles for the elderly and handicapped, provides no funds for operating costs. Also, no ongoing Urban Mass Transportation Administration program provides operating funds for small towns or rural areas of less than 50,000. One transportation project director told us that eight of his vehicles were idle because of insufficient operating funds. Some Federal officials told us that it is difficult to find sponsors for the section 16(b)(2) program, which covers only capital costs, because it is hard to find operating funds.

According to an Institute of Public Administration study, the lack of funds to operate or purchase vehicles is viewed as a restriction to coordination because some project officials

believe that they need to expand their capacity in order to coordinate. The study said that some officials believe that social service agencies are unwilling to coordinate with others until they see additional available capacity.

Most Federal programs require local matching funds. Some officials at local, State, and Federal levels believe that it is hard to get local funds. Sometimes Federal or State policies increase that difficulty. The title XX program is a case in point. The Federal share of title XX services is 75 percent, except for a 90-percent match for family planning services. Some States require the service provider to provide the matching share. AORTA has provided a 25-percent match plus 5 percent for State administration; OATS has provided a 25-percent match. These nonprofit organizations must find some source of local funds to cover this match. This is complicated because Federal title XX regulations do not allow locally provided funds to be designated for a specific organization. Thus, when OATS or AORTA solicit contributions they must make it clear that checks or other funds cannot be earmarked for them.

While none of these funding problems prohibit coordination, people perceive them as barriers to coordination.

Incompatibility

Coordination may not take place because project officials view their goals, needs, or client groups as being incompatible. Program officials serving different target groups, such as elderly and children, believe that coordination is not feasible because of client incompatibility. For example, some elderly do not want to ride the same vehicle that Head Start children ride. Others do not want to ride in vehicles sponsored by a community action agency or by title XX because they fear the stigma of a "poor people's bus system." A program serving Spanish-speaking clients told us that other groups may not want to coordinate with them because they speak Spanish. An OATS program official pointed out that the elderly fear that if other groups use OATS, it will no longer cater to their needs.

When we asked various local groups why they did not coordinate their transportation services with the systems we studied, we were told that conflicts in transportation needs inhibit coordination. For example, officials operating a school for retarded children told us that it would not coordinate with AORTA because AORTA does not provide the

door-to-door service that the children need. Several agencies, such as a community action agency and a welfare agency, told us that their needs are not adaptable to prescheduled, advance-notice service because they have immediate needs. One sheltered workshop in OATS' area said that it needs its own vehicle to transport staff as needed. A Head Start agency official said that DAST and the Head Start agency need vehicles at the same time during the day. Some project staff told us that their clients require special treatment such as help getting on or off a vehicle or direct supervision while on a vehicle. For example, one program serving the elderly and handicapped hesitated to coordinate with AORTA because program officials worried that AORTA's drivers would not be able to assist their clients. Sometimes drivers perform other functions--in OATS' service area, title VII drivers supervise meal sites or sheltered workshops. These projects see no benefit to coordinating with OATS because OATS' drivers cannot perform these functions.

Federal and State officials told us that the Vocational Rehabilitation Program encourages its clients to become self-sufficient. Thus, vocational rehabilitation counselors and the sheltered workshop staff where these clients work may want clients to find their own transportation.

Concern that coordination is not beneficial

Concern that coordination is not beneficial or that one's clients may be adversely affected contributes to a lack of coordination. It has not been demonstrated to many local officials that there are benefits to coordination. Officials at all levels of government, including local project staff, have said that turf protection exists at all levels. Programs are reluctant to share resources and prefer the flexibility of having their own vehicles. The OATS General Manager said that it is a rare program that will give up a piece of equipment that gives that program identity.

Some organizations have told us that they have not coordinated with OATS or RADAR because they feared that these transportation systems were not capable of meeting their needs. Officials of one organization providing transportation to the Wenatchee, Washington, area believed that many organizations think a coordinated system would reduce the level of service currently provided to their clients. Officials of the Council on Aging in Wenatchee believed that its primary responsibility was to provide services to the elderly, which it was doing. They could see no reason to expand and take on additional client responsibility.

Another concern is that clients may not receive priority service. A transportation project director in Hartford, Connecticut, told us that he originally set up business by pooling vehicles from senior centers. However, he said he has since given those vehicles back to the centers because the centers became too protective of their clients and vehicles. They complained to him that one center was getting more trips than another. He said the centers' vehicles wore out, and now that he has his own vehicles and the centers purchase service from him as a third-party provider, operations are smoother.

Some organizations fear that coordination will adversely affect their entire program because of wear and tear on their vehicles. For example, both Federal and local Head Start officials said that Head Start projects fear letting others use their vehicles because they would wear out sooner. Because there are no special funds for buying new vehicles, Head Start projects do not want to coordinate. They did not seem to be aware of Head Start's policy about sharing equipment nor had they thought about charging other projects for operating costs, such as gasoline and oil, and a fee for using the vehicle.

Some organizations are incorporated to transport only specific target groups--OATS and SCT can provide service only to the elderly and the handicapped. Unless this limitation is changed, their coordination potential is restricted.

Some human services agencies believe that they can provide transportation themselves at less cost than through coordination. However, federally funded grantees generally do not know the actual direct and indirect costs of providing their own transportation because Federal grantor agencies do not require local projects to maintain such information as a separate budget item. ARC, in commenting on our report, said that the "perceived" cost by human service agencies is below actual cost and that as long as accountability procedures allow administrative costs of the transportation component to be counted as a general overhead cost, agencies will continue to believe that providing their own service is the best way to go. ARC believed that agencies should develop accurate estimates of all costs of providing transportation.

Transportation regulation

Several of our case study projects regularly transported clients across State lines. Although this was a small part of their transportation efforts, we questioned whether these projects would need to obtain operating authority from the

Interstate Commerce Commission (ICC) to operate interstate. An official told us that federally subsidized grantees that regularly furnish transportation and operate interstate should obtain operating authority from ICC if the transportation providers' employees are not volunteers. The official said this would apply even when the transportation provider does not charge a fare.

In its response to our report, ICC took a different position. ICC stated that when the project did not receive compensation from the passengers, a federally funded entity that provides transportation for certain disadvantaged persons would not fall under ICC regulation. In addition, the Commission pointed out that the question of whether the carrier's employees are paid or volunteer is of no consequence in this matter.

However, transportation systems may be regulated by State utility commissions. State regulations may be restrictive. For example, in 1974 the Connecticut Public Utilities Commission denied VTD the right to operate outside the Lower Naugatuck Valley. This ruling terminated VTD's service to valley residents needing special medical services outside the Valley. Seven social service agencies had transportation needs that included travel to points outside the Valley and therefore could not use VTD. Effective in March 1977, however, the Commission granted authority to VTD to transport elderly and/or handicapped persons outside the Valley to health and human services activities. AORTA and OATS feared that if they were regulated by public utility commissions, they would lose their flexibility to change routes and negotiate contracts, which would make future coordination difficult.

Lack of concerted Federal effort

Even without the hindrances just discussed, transportation services may not be coordinated because Federal and State officials fail to recognize coordination as an issue and no mechanism to coordinate transportation activities exists.

No one Federal agency is responsible for seeing that coordination takes place. Some agencies have tried to improve coordination of transportation services through interagency agreements, demonstration projects, and studies. However, categorical programs tend to foster the idea that each program is a totally separate entity. Program officials, whether they are Federal or local, tend to be concerned only about their

programs. Except for DOT programs, if transportation is not a program's primary objective or service, coordination of transportation services is not encouraged or even considered by many Federal officials.

Some program officials who have thought of coordination possibilities believe that it is the responsibility of State agencies or local grantees. ARC, in commenting on our report, also said that local grantees should be responsible for coordination provided that adequate funding is available.

There are few incentives to coordinate transportation service and no penalties for not coordinating. It is not likely that HEW would refuse to fund a Head Start project if, for example, the project failed to coordinate its transportation needs or resources with a title III project. Two OMB officials said that it is time consuming and costly for a Federal agency to coordinate, and that they had no suggestions on how to create incentives.

SUCCESSFUL COORDINATION

As shown by our case studies (see vol. II), coordination has occurred by overcoming or not encountering the hindrances we have discussed. Strong leadership and support from local and State governments contributed to and initiated successful coordination.

Overcoming hindrances

Some hindrances we discussed have not been encountered by some projects we studied. At least one project official ignored hindrances that he perceived as blocks to coordination. For example, he viewed the eligibility criteria for different categorical programs as restrictive. He believed that legally, he should transport only a given Federal program's clients on a vehicle he purchased with that Federal program's funds, but he ignored this perceived restriction and transported his clients on any available vehicle.

Although several project officials viewed the paperwork and red tape needed to meet accountability requirements for title XX as a hindrance to coordination, several of them had contracts with their State title XX agencies. OATS and VTD developed elaborate accounting systems to determine information which enabled them to meet title XX requirements.

Several approaches to overcoming organizational problems, such as turf protection and client advocacy, have proven successful. Rhode Island forced transportation coordination when its Division on Aging told community action agencies that all future funds for the transportation of elderly persons would be awarded to SCT. The General Manager of OATS told us that being a good salesman is important in overcoming turf protection because it involves convincing people that it is more efficient and cheaper to have OATS provide the transportation service.

Third-party providers, such as DAST, RADAR, and VTD, help overcome several hindrances by avoiding the

- perception of association with one particular social service program,
- issue of operating at a profit or subsidizing another program's transportation activities because programs can enter into purchase-of-service contracts with service providers,
- necessity of a social service program taking on additional transportation responsibilities, and
- concerns by social service agencies that the provider will favor clients of one program over another.

In addition, a third-party provider facilitates greater operational flexibility by matching vehicle resources with needs, being more likely to develop necessary transportation expertise, and lending itself more readily to direct governmental support. In Delaware several social service agency officials commented that (1) a coordinated system is the most effective means of providing social transit, (2) transit should be left to transportation specialists who can do a better job, (3) local social service agencies spend hours operating their own transit systems but are not cost effective because of fragmented delivery, and (4) there are inherent inefficiencies in developing one system.

Circumstances contributing to coordination

An interest in transportation coordination begins at the local or State level. For example, RADAR was created with the support of a local human services planning organization and the Virginia State government which enacted legislation to authorize pilot programs for the most efficient and economical

delivery of human services. The legislation required support by resolution of the local government where the project was to be located and required State agencies to cooperate with the Governor and the local government in implementing pilot programs. Furthermore, the legislation aimed at reducing possible hindrances by empowering the Governor to (1) revise State agency rules and regulations and (2) request any Federal agency to waive its rules and regulations if necessary. Interestingly enough, RADAR has requested no waivers.

The Cape May County (New Jersey) Board of Chosen Freeholders was instrumental in developing Fare Free when it established a county Traffic Department in 1974 to operate two buses it had purchased for the elderly poor. It then expanded this service. In 1975 the board passed a resolution authorizing all social service agencies with transportation resources to consolidate facilities and to coordinate activities under the Department of Traffic.

DAST, a public authority, began as a private, nonprofit corporation created by several social service agencies in a local area. After 3 years agency officials decided that a public authority would be more desirable than a private agency because it could benefit financially through direct State operating subsidies, tax-free fuel, and centrex telephone systems. The board and staff of DAST's predecessor were able to obtain support from the Governor of Delaware, the State Division of Transportation, several legislators, and other interested agencies in drafting legislation to create DAST, which is now a statewide system.

Strong leaders, such as the Directors of Fare Free, SCT, and PFP, among others, who were committed to coordination and who took the initiative to promote it among other agencies, appear to be a key to successful coordination. Because there are few Federal incentives to coordinate transportation services but many hindrances, it takes a committed, persevering individual to promote the concept and take action, including persuading local government to provide more aid and persuading State and Federal officials to accept minimal levels of accountability. Furthermore, a strong leader can improve coordination within a system by persuading human services providers to be more flexible. For example, medical appointments are usually scheduled on an individual basis, making it difficult for a provider to schedule group transportation to the medical facilities. SCT and the Rhode Island Division on Aging met with the Rhode Island Medical Society to get cooperation from doctors and hospitals in scheduling older persons for

appointments in a block of time so that SCT could schedule older persons' transportation in groups rather than individually. Fare Free also persuaded doctors and medical clinics to schedule appointments so the Fare Free clients could be transported together.

It appears that for those projects that are coordinating (excluding RADAR, DAST, and VTD) some success is due to informal agreements. For example, Fare Free informally agreed with the Cape May County Welfare Board that the welfare agency could provide transportation for Fare Free's clients when Fare Free was transporting at its capacity level. Also Fare Free and a nutrition project arranged for Fare Free to transport some people to two of the project's three nutrition sites while the project used its own vans for the third site. PFP informally arranged with a county Health Department for both agencies to coordinate individual travel needs of their respective clients. For example, if a Health Department client needed transportation to Chattanooga, Tennessee, on a day when the Department's van did not go to Chattanooga, the Department asked PFP to provide transportation. PFP also asked the Health Department for transportation in similar circumstances. Neither agency reimbursed the other for these services.

STATE AND FEDERAL EFFORTS TO COORDINATE TRANSPORTATION

The Federal Government has recognized that increased intergovernmental cooperation and coordination are needed. A discussion of some Federal efforts at improved coordination, in general, and improved transportation coordination, specifically, follows.

OMB Circular A-95

Two statutes--the Demonstration Cities and Metropolitan Development Act of 1966 (42 U.S.C. 3334) and the Intergovernmental Cooperation Act of 1968 (42 U.S.C. 4231)--were designed to increase intergovernmental cooperation and coordination by setting up formal communication channels among parties that might be affected by a federally funded project. OMB implemented the two statutes through OMB Circular A-95. Its purpose was to facilitate intergovernmental cooperation by offering State and local governments the chance to comment on the consistency of federally funded projects with local policies, plans, and programs.

The circular is based on OMB's premise that communication is fundamental to coordination. If people talk to each other, they can identify common interests and conflicts. Cooperation and negotiation can then take place. The review and comment process is designed to create a climate for intergovernmental cooperation in which coordination is likely to occur.

The Project Notification and Review System, under part I of Circular A-95, encourages, by early contact among applicants for Federal assistance and parties that might be affected, expeditious intergovernmental review and comment. First, applicants are to notify clearinghouses, which are agencies that OMB recognizes as appropriate agencies to carry out the Project Notification and Review System for proposed Federal or federally assisted projects. Clearinghouses are to receive and disseminate project notifications and applications for review and comment to appropriate State agencies, local governments and agencies, and regional organizations. After this review, applicants may submit formal applications to Federal or State funding agencies administering Federal programs.

A potential applicant for assistance under a program covered by Circular A-95 is required to notify the clearinghouses of its intent. Clearinghouses generally have 30 days in which to evaluate the proposal's relevance to any State or areawide plans, notify interested agencies, and resolve conflicts. They have another 30 days to review the completed application. Their comments must accompany the grant proposal submitted to the Federal agency.

We spoke with A-95 State and areawide clearinghouses to find out (1) what role they play in coordinating transportation services and (2) how their role could be strengthened.

State clearinghouse officials said that State agencies usually review and comment only on the primary objectives of a proposed grant, not on support services such as transportation. An official of Delaware's State clearinghouse told us that it is not possible to work at coordinating specialized transportation on the basis of information presented in a grant application. He said that it is practically impossible to ferret out the transportation component of social service grants because it is not a line item in budgets and therefore not identifiable. Therefore, A-95 staff have no way to review it. Officials of at least one other State clearinghouse and an areawide clearinghouse pointed out the same thing. They said that because there is no budget breakdown, it is difficult to separate the transportation component.

Areawide clearinghouses we contacted in most States review applications; however, their level of involvement and success in improving coordination varies. A clearinghouse official in Tennessee told us that the clearinghouse takes an active role in coordinating transportation resources and gave us an example of its success. A clearinghouse official in Missouri said that he knew who the transportation providers were in the area and therefore could check for duplication. He said that he had never formally recommended transportation coordination to a Federal agency because any possibility of duplication of this service was always resolved during the review process.

Personnel of one areawide clearinghouse in Oregon told us that while checks are made for coordination of transportation services, this is difficult to do because no list of transportation providers in the area exists. They said that they were developing a regional special transportation plan to identify these providers. In Virginia, one areawide clearinghouse official said that it does not review proposed applications for the purpose of coordinating transportation services if the service is only a small component of the application.

OMB officials told us that they do not see what role A-95 agencies could play in improving coordination of transportation services nor do they see that OMB's role is to strengthen the role of A-95 agencies. OMB views the A-95 process as a local and State process. According to OMB, it is not the role of the Federal Government to tell agencies how to operate. A-95 cannot assure coordination of anything, according to OMB. Rather, it is designed to create a climate for intergovernmental cooperation.

Federal Regional Councils

Federal Regional Councils (FRCs) were established by Executive order in 1972 to develop closer working relationships among major Federal grantmaking agencies and State and local governments and to improve coordination of the categorical grant system. In 1973 their activities were expanded to include coordination of direct program assistance to State and local governments. General policy and guidance for FRCs is formulated by the Under Secretaries Group for Regional Operations.

Beginning in September 1974, FRCs assumed responsibilities for coordinating the implementation of OMB Circular A-95.

OMB perceived FRCs' role in implementing the circular to be answering questions, disseminating information, handling complaints, and providing feedback to OMB. FRCs' implementation has been hampered by limited staffing and inconsistent commitment by Federal agencies to FRCs.

At least one FRC has taken an interest in coordinating transportation resources. The Southeastern Federal Regional Council sponsored a task force to evaluate legislative, regulatory, policy, and procedural guidelines on transportation. It found no legal barriers to coordination and believed that most, if not all, Federal requirements could be met by a system that insures fiscal accountability of program dollars and service-level accountability for each target group. This FRC also supported an HEW Region IV study identifying transportation authorities in Federal human services programs. Furthermore, the FRC has supported an HEW Region IV request for demonstration funds to evaluate how effectively single-purpose social service agencies provide transportation.

Working agreements

Several working agreements to improve coordination among various Federal departments and agencies have been signed in the last 2 years. HEW's Administration on Aging and DOT entered into such an agreement in September 1975. One of the goals of this agreement is to work toward pooling health and social service program resources available to States and communities to pay the operating costs of transporting elderly and handicapped persons. Another goal is to work toward the coordination of public mass transportation services with special transportation services for the elderly and handicapped.

The joint working agreement between the Administration on Aging and DOT resulted in some positive achievements such as several jointly sponsored workshops on coordinating transportation held in the fall of 1976. One Administration on Aging official believes that the Administration's working agreement with DOT has been the most successful of all its working agreements. However, one DOT official said that not much has been accomplished with the Administration on Aging working agreement. As of January 1977 the Administration on Aging was contracting for an evaluation of the success of its various working agreements. It expected this to be completed in the fall of 1977.

Section 147 Rural Highway Public Transportation
Demonstration Program

Section 147 of the Federal-Aid Highway Act of 1973, as amended, established a program

"* * * to encourage the development, improvement and use of public mass transit systems operating vehicles on highways for transportation of passengers within rural areas and small urban areas, and between such areas and urbanized areas, in order to enhance access of rural populations to employment, health care, retail centers, education and public services."

One of the four major program objectives DOT established for the program was to encourage the various programs or agencies that provide transportation or social services to develop a coordinated approach to the organization and financing of public transportation. Furthermore, several of the project selection criteria listed in the program regulations were specifically concerned with coordinating services and financial resources.

DOT expects to conduct a national evaluation of the section 147 program to assist it in determining realistic approaches to coordination and appropriate funding levels.

Office of Human Development Transportation
Demonstration Program

To develop a knowledge base on transportation coordination and affect national policy and programing of human services transportation, HEW's Office of Human Development has initiated a 2-year program to demonstrate the feasibility of coordinating and/or consolidating existing transportation resources at the sub-State level.

Specific objectives of the program are to:

- Encourage human services programs that provide transportation services to develop practical approaches to coordinate and/or consolidate transportation services at the local level.
- Explore and test transportation service delivery systems and organizational methods that could lead to more integrated or centralized (hence more cost-effective) transportation services.

--Develop and test methods for greater coordination of existing public and private transportation providers, such as buses and taxis, with human services agency transportation services.

--Identify statutory, regulatory, or administrative barriers to implementing coordinated and/or consolidated approaches to the organization and financing of transportation services, including public transportation programs.

Office of Human Development officials anticipate that this program will (1) serve to formulate successful coordination models, (2) identify and resolve major obstacles to the coordination process at all levels of government, and (3) develop a national interagency policy regarding human services/public transportation coordination.

Working in cooperation with DOT, the Office of Human Development awarded five grants in June 1977 to demonstrate both the transportation and consolidation process among participant grantee agencies of HEW, DOT, CSA, and DOL. Onsite technical assistance will be provided to each grantee to assure effective design, implementation, and operation of the coordinated/consolidated system. Also, a concurrent evaluation will measure and compare the processes and impact of coordination and the efficiency and effectiveness of each system.

HEW-proposed regulations

In December 1976 HEW issued a notice of proposed rule-making to waive HEW requirements impeding improvements of human services delivery by State and local governments. Besides these general purpose governments, HEW intends to include private, nonprofit agencies. The notice states that waivers can be made when HEW's requirements impede an applicant's efforts to achieve such things as (1) the integration, coordination, or linking of human services funded under two or more HEW programs, (2) integrated budgeting, planning, or evaluation of human services, (3) joint funding of human services, and (4) coordinated transportation programs.

The proposed waivers apply only to HEW-established requirements, not to requirements written by OMB or other Federal agencies or prescribed by Federal legislation. HEW officials said that they envision the requirements to be subject to waivers covering eligibility, reporting, and

State administration. HEW officials responsible for these proposed rules could not identify any specific HEW regulations impeding coordination efforts other than those for Maternal and Child Health and Child Welfare services, which both require that a single agency administer the program in that State. However, they believe that restrictive regulations exist and that individual waiver requests will point these out.

The proposed regulations state that " * * * the granting of a waiver will not result in the expenditures of Federal funds for purposes other than those for which they are appropriated." HEW officials told us that they had not considered cost-sharing, reimbursement, or depreciation issues when they wrote the proposed regulations, and they did not know when the regulations might become final.

Federally sponsored studies

HEW and DOT have sponsored several studies dealing with human services transportation. Although transportation coordination was not the primary objective of all these studies, it was covered.

The Institute of Public Administration has completed three reports for HEW's Administration on Aging. The first report, issued in January 1975, is entitled "Transportation For the Elderly: The State of the Art." It includes a general review of the state of the art of transportation projects serving older Americans and an examination of specific case study projects considered representative of the types of special service in rural and urban areas that might be suitable for communities throughout the country.

The second study, prepared by the Institute and issued in November 1975, is entitled "Planning Handbook: Transportation Services For The Elderly." It provides guidance and assistance on designing and operating a special transportation service.

In November 1976 the Institute issued another study for the Administration on Aging entitled "Transportation For Older Americans-1976, Progress, Prospects And Potentials." The report documents much of the progress made regarding transportation for elderly persons since the Institute published its state-of-the-art report in January 1975.

The Institute also developed a state-of-the-art report on coordination for the Urban Mass Transportation Administration

entitled "Coordinating Transportation for the Elderly and Handicapped: A State of the Art." The report explores and identifies the scope and magnitude of coordination efforts to provide transportation services for elderly, handicapped, and other transportation disadvantaged people.

George Washington University's Technology Assessment Group developed a report for DOT in 1975. This report-- "Revitalization of Small Communities: Transportation Options"--was the result of a 2-year policy-oriented, interdisciplinary study of the long-range trends affecting small towns in nonmetropolitan areas, the effects of transportation availability and systems on their viability and vitality, and their transportation needs and problems.

DOT sponsored a study entitled "Rural Passenger Transportation Technology Sharing: State-Of-The-Art-Overview." This study presents an overview of rural passenger transportation with special emphasis on issues and considerations associated with improving rural resident mobility and a focus on profiling small, specialized rural passenger transportation systems.

In January 1976 HEW's Office of the Regional Director in Atlanta, Georgia, with the cooperation of the Southeastern Federal Regional Council, prepared a study entitled "Transportation Authorities in Federal Human Services Programs." This was an inventory of statutory and regulatory authorities in federally funded human services programs that authorize the expenditure of funds for client transportation services and/or payments.

State efforts

Several States have taken action to facilitate coordination or address the problems of people with special transportation needs. For example, South Carolina legislated the establishment of an Interagency Council on Public Transportation to give advice and make recommendations to the State Department of Highways and Public Transportation and the General Assembly on all matters dealing with public transportation in the State. Organizations represented on the Council included the South Carolina Commission on Aging, the Departments of Social Services and Vocational Rehabilitation, and the Office of Transportation in the Department of Education. The Governor of Michigan created a similar organization by executive directive.

SUGGESTIONS TO ELIMINATE HINDRANCES

While these efforts at coordination have been helpful, there has been no coherent, interdepartmental effort at the national level to tackle the specific issue of coordinating transportation resources or eliminating hindrances. Various officials have suggested to us ways to eliminate or at least minimize hindrances to coordination of transportation. These suggestions range from general broad approaches, such as consolidating Federal programs or redesigning the approach to Federal assistance so that programs are based on functions rather than target groups, to narrow approaches, such as requiring potential grantees to show budget line items for transportation expenditures.

Officials recognize the lack of coordination at all levels of government. Federal agencies have difficulty coordinating high-priority issues like energy conservation; therefore, it is not surprising that little effort has been made to coordinate transportation resources. Some of the suggestions made to us that the executive branch could take to improve coordination were:

- Make one Federal agency responsible for coordinating an interagency, multilevel effort for transportation coordination.
- Make one agency responsible for pooling transportation dollars (centralized funding control for all transportation dollars).
- Instruct HEW, which administers most of the programs providing transportation, to come up with a solution and extend it to other agencies through interagency agreements.
- Require that Federal and State staffs responsible for Federal programs operated by State agencies (Medicaid, title III, title XX, section 16(b)(2)) work together on planning their programs' services, including transportation.
- Strengthen the A-95 process by including all Federal programs in parts I and IV of the OMB Circular.
- Mandate transportation coordination, including the requirement that grantees must show how they will coordinate.

Some suggestions concerned how the Federal Government could help local projects to coordinate:

- Identify transportation coordination as a national priority and encourage it.
- Provide technical assistance to local and State organizations on how to coordinate.
- Create regional level task forces for specific geographic areas to discuss transportation coordination among programs that provide transportation.

Some officials suggested ways to force coordination of transportation services including

- Federal agencies setting up third-party transportation systems from which all social organizations would have to purchase service and
- the Federal Government mandating coordination of transportation resources among Federal agencies.

OMB and HEW officials responsible for implementing regulations within their departments pointed out that a flexible environment is needed so that local project officials can coordinate if they want to. HEW officials suggested that OMB circulars should clearly state that grantees may share property, such as vehicles purchased with Federal funds, and that the grantee owning the vehicles may charge rent or other fees for using them. HEW officials thought that this would be a simple and convenient way to distribute the cost of vehicles among users and give an incentive to the providing organization to share vehicles. HEW officials said that the fee paid by the user need not include the cost of gasoline or other operating costs that could be paid separately by the users. Furthermore, HEW officials believed that this clarification in OMB circulars, and therefore in agency regulations implementing the circulars, would alleviate grantee fears about cost accountability. The officials believed that the Federal Government should not delineate how arrangements for sharing vehicles had to be made but should leave this to be resolved at the local level. An OMB official agreed with the feasibility of these suggestions, as long as the income generated was accounted for.

Some Federal officials suggested that the Congress needs to take action to:

- Clarify laws regarding pooling of resources so there is no misinterpretation.
- Provide funds for demonstrations and studies of coordinated transportation systems.
- Provide funds specifically to replace vehicles in social service projects.
- Appropriate funds for human services programs' transportation needs and funnel these funds through one central agency.
- Designate someone in DOT to be Coordinator of Social Service Transportation.
- Require that Federal agencies coordinate their programs' transportation services.
- Issue a policy letter asking various programs to coordinate all services to the degree possible; after a time lapse, determine if transportation has been coordinated. If transportation has not been coordinated significantly, mandate coordination.
- Establish uniform eligibility for social services recipients so that persons eligible for transportation under one program would also be eligible for transportation under others.
- Delineate clearly the responsibilities for providing similar services under different programs.
- Reduce the number of categorical programs.

Some individuals told us that there is no real solution or method to coordinating transportation services unless the total number of categorical programs is reduced. A staff member of the Advisory Commission for Intergovernmental Relations told us that until the Congress gets away from the categorical program approach aimed at specific target groups and begins to look at the needs and functions of the whole person, which may mean going to the block grant approach, coordination is not really feasible. At this time, local project staffs may not see coordination as worthwhile, even if it costs less, because they perceive that their projects are more effective when they provide their own transportation service.

In commenting on our report, ARC, CSA, HUD, and DOT proposed solutions to the coordination problem, some of which are similar to those found on pages 48 through 50. Both ARC and HUD suggested that DOT should be the focal point of a Federal coordination effort. However, HUD proposed that if all 114 programs we identified are to continue providing transportation services, coordination should take place at the local level. ARC also believed that the basic responsibility for coordination resides at the local level. ARC proposed that any sponsor desiring money for transportation services as an adjunct to other services must first conduct an appraisal of existing transportation resources. HUD suggested that this local level coordination should be done by requiring each community desiring assistance to have a transportation services program.

HUD further suggested that the Urban Mass Transportation Administration could fund the preparation of a transportation services program. All grant requests for transportation services from a community would have to be consistent with the local program and coordination arrangements in effect. Cost sharing among Federal agencies could then be worked out on the basis of the communitywide or areawide program with DOT acting as coordinator.

HUD proposed another approach--limit the number of Federal programs that can provide transportation service. HUD believed that four or five Federal programs that are highly oriented to providing transportation services might be the only sources of funding for these services.

CSA had several suggestions. One was to designate transportation providers for local jurisdictions, similar to the areawide clearinghouses that have been designated. They would either provide service themselves out of pooled resources or assure the establishment of a third-party transportation provider. CSA also suggested that Federal agencies should be required to give preferential treatment in funding review to projects that meet their transportation needs through a coordinated system.

ARC commented that its experience has been that as long as a Federal agency speaks clearly and simply, the State will follow suit. ARC had a flexible funding approach by which it gives a "single allocation" grant to each State instead of strictly categorical grants. ARC believes in maximum local autonomy and minimum Federal intervention. However, it believes that it is desirable to require that local social

services agencies develop accurate estimates of all direct and indirect costs for transportation service so that the agencies will see the benefits of service consolidation and be willing to pay another agency an appropriate fee for the service.

CHAPTER 5

CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS

For the 114 Federal programs we identified as providing transportation for program beneficiaries, we did not identify any express statutory or regulatory restrictions that specifically prohibit coordination of transportation resources. However, we did identify a number of hindrances to transportation coordination efforts.

These hindrances include

- problems inherent with the categorical grant approach to Federal assistance;
- grantee worries about the availability of continuous funding;
- incompatibility or perceived incompatibility due to differences in client groups (age, income, and so forth) and differences in transportation needs of client groups;
- concern that transportation is not beneficial or that one's clients may be adversely affected by coordination;
- State transportation regulation;
- accountability, paperwork, and bookkeeping problems; and
- lack of a concerted Federal effort to coordinate transportation.

However, it appears that the most significant hindrance is confusion at all government levels about how much coordination federally funded projects may engage in. Some of the problems mentioned exist because of this confusion.

It is not clear under what circumstances and to what extent the Congress has endorsed the use of facilities and equipment acquired for one program to support the transportation activities of another program. Federal legislation generally is silent about transportation coordination or cost sharing.

Government-wide regulations are of little help to executive agencies and Federal grantees concerning transportation coordination. Few Federal program regulations mention transportation coordination, and those that do, offer little real guidance to grantees who consider coordination.

Our case studies and studies by others indicate that despite the various hindrances and the lack of clearly defined congressional intent, some coordination is taking place. Strong local leadership appears to play an important role in successful coordination activities. Independent third-party human services transportation providers appear to be able to avoid many real or perceived hindrances to coordination because they are in fact vendors of services with which most human services agencies can contract. However, as our case studies indicate, hindrances exist even in a third-party, transportation-provider environment.

A number of solutions have been suggested on how to eliminate various hindrances to transportation coordination. We believe that many of these solutions are not administratively feasible or practical at the present time. Although a number of the problems we identified that hinder coordination might be resolved or minimized through administrative or legislative actions, our review did not explore the effect of such actions on other aspects of the programs or agencies.

In many cases, transportation represents only a small portion of a program's or agency's functions. Further study would be required to determine the effect on other functions before recommendations for specific changes in individual programs or agencies could be made to improve transportation coordination. Likewise, more work on the process of coordination, such as HEW's Office of Human Development Transportation Demonstration Program, is necessary to determine if the suggested solutions are beneficial.

We believe that coordination of federally funded transportation resources is desirable to the extent feasible providing there is appropriate cost sharing and accountability. Furthermore, we believe that the Federal categorical grant approach to solving various problems should not create artificial barriers to the most productive use of resources needed to meet the transportation needs of program recipients. Our recommendation is intended to insure that grantees desiring to share and pool transportation resources and services with other grantees will be aware of the circumstances in which transportation coordination is permissible and the procedures that must be followed to insure equitable cost sharing and appropriate accountability.

As discussed on page 7, we attempted to obtain information on the cost of transportation being provided by Federal programs. However, we were not able to develop complete or even estimated cost data. We believe that it is important to know the magnitude of transportation costs and how they are used in order to assist OMB and Federal agencies in developing appropriate regulations.

RECOMMENDATION TO THE CONGRESS

One of the fundamental hindrances to coordinating federally funded transportation resources appears to be the lack of a clearly defined congressional intent regarding (1) use of program resources to benefit persons other than designated program beneficiaries and (2) need for and extent of reimbursement for any interprogram use of resources. Therefore, we recommend that the Congress minimize this confusion by endorsing transportation coordination, when feasible, among various Federal programs and federally funded projects, providing there is appropriate cost-sharing and cost and service accountability.

RECOMMENDATIONS TO THE DIRECTOR OF THE OFFICE OF MANAGEMENT AND BUDGET

We recommend that, consistent with the Congress endorsement of transportation coordination, the Director of OMB:

1. Issue regulations that provide clear guidance to grantees concerning
 - a. the permissible sharing of grantee transportation resources and
 - b. reimbursement procedures when a grantee or program provides transportation for beneficiaries of another grantee or program.
2. Provide guidance on allocating property costs among federally funded projects when property acquired by one project is used by other projects. Such guidance is necessary to avoid having the acquiring project pay the entire cost of replacing a worn out vehicle sooner because of shared use.
3. Direct heads of Federal departments and agencies to assist OMB in developing administratively workable regulations by

- a. developing information on the nature and cost of transportation provided to beneficiaries of Federal programs,
- b. identifying the potential for coordinating transportation provided under these programs, and
- c. identifying any administrative difficulties that might be encountered in coordinating transportation provided under these programs.

AGENCY COMMENTS AND OUR EVALUATION

We solicited comments on this report from the 11 Federal departments and agencies whose programs we identified as providing for transportation. (See apps. IV to XIV.) In addition, we obtained comments from ICC (see app. XV) and OMB (see app. XVI). Only four agencies--OMB, HEW, HUD, and DOT--had specific comments on our recommendations. Most of the other departments and agencies were concerned with methods of implementing coordination or the need for more or improved transportation rather than the need for congressional endorsement of the transportation coordination concept. Comments from executive agencies reinforce our findings that there has been no concerted, overall Federal effort concerning the potential for greater coordinated transportation services.

Comments on our recommendations

OMB did not agree with our recommendations to it because it was not convinced that a transportation coordination problem exists. OMB pointed out that we found no statutory or regulatory restrictions prohibiting transportation coordination. OMB did not believe that we presented sufficient evidence to show that current transportation activities are not being properly coordinated. Further, it stated that we did not attempt to evaluate whether transportation coordination is more efficient.

It appears that OMB is uninformed of the problems caused grantees by a myriad of Federal programs serving the same or similar purposes. Federal agencies such as CSA, ACTION, ARC, and DOT, which are closer to the grantee recipients, agreed that transportation coordination problems exist and need to be corrected. Some of these agencies even proposed suggestions or solutions to the coordination problem.

Although we found no express statutory or regulatory restrictions that specifically prohibit transportation coordination, we did find hindrances. In this regard, ARC said in its comments that "whether or not such prohibitions exist, such hindrances as have been identified are as real and formidable as any in a statutory or regulatory form." ARC believes that consistent and clear Federal policy would help coordination efforts.

HEW expressed concern that congressional endorsement of transportation coordination could possibly jeopardize existing services and any future potential for achieving effective coordination. The agency believed that there is little evidence about the real benefits to be derived from coordination and that this lack of knowledge is the single most important barrier to coordination. HEW believed that without the results of its Office of Human Development's Transportation Demonstration Program to test several models of coordinated/consolidated transportation activity, it is unable to know the advantages or disadvantages of coordination or the hindrances to the coordination process.

One of HEW's principal questions was why we would ask for congressional endorsement of a concept that has not been proven beneficial. Furthermore, HEW officials expressed concern that requiring cost- and service-level accountability for transportation services places an enormous burden on project managers who have no expertise in transportation. These officials were worried that OMB could issue regulations that would be very restrictive and difficult to implement at the local level. Although HEW suggested that we reconsider our recommendations, it did not suggest alternative recommendations. HEW prefers to wait for the results of its demonstration project before deciding on a course of action.

Our review was not designed to test or prove the benefits of coordination. We responded to the Committee's request to identify those Federal programs that provide transportation and hindrances to transportation coordination. Our report and recommendations are not intended to endorse mandatory coordination. We are merely recommending that the Congress endorse the concept of coordination so that, where feasible, projects may coordinate. We are also recommending that consistent with congressional endorsement,

OMB clarify some confusing regulations. Cost and service accountability must be concerns of any Federal program; without some uniform guidance on this matter, there would be no assurance of equitable treatment for all parties involved in coordination.

HUD criticized our recommendation that would require agencies to collect information on the nature and cost of client transportation because of the amount of paperwork it would involve. However, OMB and HEW criticized the report because they did not believe that enough information was available for any specific decisions to be made concerning what needs to be done about coordinating transportation.

Implementation of our recommendations should provide more information with which to make judgments about the merits and pitfalls of coordination. Such information should be valuable in determining what uniform regulations would be necessary for transportation coordination.

ACTION endorsed the concept of transportation coordination among various federally funded projects, when feasible, and will urge project sponsors to make every effort to coordinate.

ARC told us that as a matter of policy, it has promoted service consolidation for its projects whenever possible.

DOT said that we had done a creditable job in identifying obstacles to transportation coordination, and it concurred in the basic recommendations of the report. DOT commented that while our recommendation for congressional endorsement of the concept of transportation coordination was useful, it would also be helpful if heads of Federal agencies would endorse the concept.

Comments on other issues

CSA was critical of the report because it did not show a greater sense of urgency about the coordination problem and it did not present a practical plan to address the problem. HUD believed that the report would be more useable if more explicit recommendations were made.

Four agencies--ARC, CSA, HUD, and DOT--proposed suggestions or solutions to coordination problems. These suggestions generally addressed the means of facilitating or implementing coordination and have been included with other suggestions listed on pages 48 to 50.

Many of these suggestions may have merit. However, we cannot endorse the operational merit of any specific recommendations until more information is available on unknowns, such as the magnitude of Federal expenditures on transportation and the benefits to be derived from coordination. Some recommendations, such as CSA's suggestions that local third-party providers be set up, would require further study to determine their effect on other aspects of Federal programs.

ARC and CSA believed that we gave insufficient emphasis to transportation needs in rural and small areas. Both agencies appear to believe that these areas were to be the primary concerns of our study. While the Committee asked us to identify all Federal programs that provide funds for transportation in rural and small urban areas, only two Federal programs we identified were geographically restrictive. Furthermore, we were unable to estimate transportation expenditures for rural and small urban areas because, except for two DOT programs, Federal agencies and departments do not keep information based on geographic location or population size.

The Committee wanted to know what restrictions or hindrances existed to transportation coordination. Therefore, we did not restrict ourselves to transportation needs in rural and small urban areas, although all but one of our case studies were in such areas. Without a systematic research effort, which would be beyond the scope of our review, we cannot conclude that any hindrances we found bore any relationship to population size or geographic location.

Both HEW and DOT had problems with our definition of coordination. DOT thought that it was too narrow and interpreted our definition--"the pooling or sharing of transportation resources by several different recipients of Federal funds from more than one categorical program"--as being limited to sharing transportation vehicles. HEW officials told us that our definition was not comprehensive or operational. They also objected to our implication that coordination would result in a better use of resources. Furthermore, HEW said that it could not agree with our findings regarding hindrances without first knowing on what basis

of coordination these hindrances were identified and examined.

Our definition of coordination encompasses various levels of coordination as well as consolidation of transportation services. Our definition is purposefully broad. We wanted it to include coordination ranging from two projects sharing a dispatcher and telephones to a group of projects giving their vehicles to one project that would provide transportation for all the others. Furthermore, regardless of semantics, hindrances do exist.

HEW officials expressed concern that the report failed to examine why HEW has had to engage in the transportation business and that we concentrated on social services agency coordination rather than improvements in public transportation that could meet the needs of social services agencies. In many rural and small urban areas--Cape May, New Jersey; counties in Missouri; most of West Virginia; and Wenatchee, Washington; to name a few--there is no public transportation. However, there are many federally funded projects in those areas whose clients need transportation in order to benefit from other program services. Furthermore, we are not aware of any HEW policies to encourage grantees to purchase transportation from public transportation providers when it is available. Where there is public transportation, such as Tri-Met in Oregon, there may be potential for coordination.

The Small Business Administration and VA said their programs covered in our report have little or no potential for transportation coordination. We agree. As we pointed out on page 12, some Federal programs, due to the nature of the transportation involved, appear to have little potential for transportation coordination.

The Department of Justice commented that the eventual adoption of our recommendations would not significantly affect its operations. The Department said that it recognized the potential for transportation coordination and would be prepared to assist in providing any information or data required to implement a coordination initiative.

The Department of Labor restricted its comments to the section regarding the Federal Regional Councils.

The Department of the Interior had no comments on the report.

JENKINS RANDOLPH, W. VA., CHAIRMAN
 EDMUND S. MUSKIE, MAINE
 JOSEPH M. MONTOYA, N. MEX.
 MIKE GRAVEL, ALASKA
 LLOYD BENTSEN, TEX.
 QUENTIN N. BURDICK, N. DAK.
 JOHN C. CULVER, IOWA
 ROBERT MORGAN, N.C.
 GARY HART, COLO.

HOWARD H. BAKER, TENN.
 JAMES L. BUCKLEY, N.Y.
 ROBERT T. STAFFORD, VT.
 JAMES A. MCCLURE, IDAHO
 PETE V. DOMENICI, N. MEX.

United States Senate

COMMITTEE ON PUBLIC WORKS
 WASHINGTON, D.C. 20510

November 12, 1975

M. BARRY MEYER, CHIEF COUNSEL AND CHIEF CLERK
 BAILEY GUARD, MINORITY CLERK

The Honorable Elmer B. Staats
 Comptroller General of the United States
 Washington, D.C. 20548

Dear Mr. Staats:

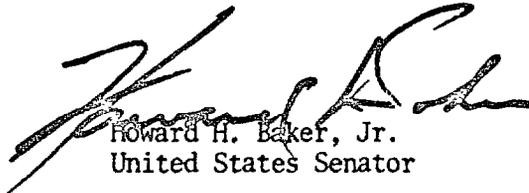
During hearings on highway legislation conducted by the Transportation Subcommittee of the Public Works Committee, several witnesses commented on the need for greater coordination among Federal programs providing or assisting rural transportation. Reference was made to the surprisingly large number of programs under which such assistance is available, and to Federal laws and regulations which inhibit or preclude coordination of individual rural transportation programs at the local level. There appeared to be a consensus that the greatest need at this time is for an exhaustive survey of Federal programs which in some manner support rural transportation and an identification of the ways in which specific program requirements thwart local efforts to create consolidated transportation systems.

The members of the Public Works Committee have discussed the problem and decided to ask that the General Accounting Office undertake a comprehensive review of the situation. The first objective of this request is the identification of all Federal grant and assistance programs which make available Federal funds for the transportation of people within rural and smaller urban areas and between these and urbanized areas. Once the programs have been identified, the study should examine what restrictions, if any, there are on the use of Federal funds under each program, whether such restrictions are imposed explicitly by the authorizing legislation or by administrative interpretation of such legislation, and the extent to which such restrictions frustrate Federal, State and local efforts to provide coordinated transportation service. It is desirable that the study also identify instances in which coordination has been achieved and the circumstances which made this possible. Finally, it is hoped that the report to the Committee will contain recommendations for eliminating Federal restrictions which hinder coordination of transportation programs.

The Committee members expect that the comprehensive study will be of value not only to this Committee but to other Congressional committees and Federal agencies involved in providing assistance to rural transportation.

We look forward to working with you on this project.

Truly,



Howard H. Baker, Jr.
United States Senator



Jennings Randolph
Chairman

INVENTORY OF FEDERAL PROGRAMS THAT PROVIDE
TRANSPORTATION FOR PEOPLE

The following chart lists 114 programs we identified as providing transportation for program beneficiaries. The chart includes (1) the program name, (2) the Federal department, agency, or office responsible for administering the program, (3) the identification number in the Catalog of Federal Domestic Assistance, (4) program and transportation objectives, (5) estimated fiscal year 1976 (not including the transitional quarter) program obligations and transportation costs, (6) client eligibility characteristics, such as age, income level, and health status, and (7) other program characteristics that affect transportation services. Except where noted, program funds can be used for both operating expenses and purchasing vehicles.

As mentioned on page 5 several groups have prepared inventories of Federal programs providing transportation. Our inventory is not identical to other inventories because either our information differed or our concept of the inventory differed. For example, the George Washington University inventory does not list programs according to catalog numbers. Several programs it listed as separate programs, such as Family Health Centers and Neighborhood Health Centers in HEW, are listed as one program--Community Health Centers--in the catalog. Others, such as the Office of Rural Development in HEW, do not provide funds for transportation programs. The HEW Region IV inventory lists 88 programs that provide transportation. We identified 50 programs not included in this inventory and excluded 22 programs that were in the inventory because (1) some programs that were listed in the 1975 catalog used by HEW to compile its list are not in the 1976 catalog we used, or vice versa, (2) information we obtained concerning a program's use of funds differed from information in the HEW inventory, or (3) some programs listed in the HEW inventory provide money for an activity tangential to providing transportation. For example, HUD's Comprehensive Planning Assistance Grant Program provides money for planning only; transportation planning may be included as part of a plan. HEW included this program in its list; we did not.

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program title	Cataly number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs (000 omitted)	Major client eligibility criteria	Other program information
DEPARTMENT OF LABOR, BUREAU OF OCCUPATIONAL SAFETY AND HEALTH	Adult Education Grants to States	13.490	Establish public education programs	Class, especially in rural areas	67,500	675	Persons age 16 and older who have no secondary school certificate or are functioning at less than a 12th grade level	
		13.491	Help conduct programs for persons desiring vocational training	School or field trips	422,691	Unavailable	All individuals requiring vocational training	Funds may not be used for the operation of vehicles
		13.495	Help States conduct work study programs	School or field trips	19,500	Unavailable	Students requiring vocational training	Funds may not be used for the operation of vehicles
		13.498	Support research, training, and pilot programs	School or field trips	9,000	Unavailable	Students in need of vocational training	Funds may not be used for the operation of vehicles
					\$ 518,691	675		
Subtotal	Vocational Education Research	13.499	Provide programs for persons with academic, social, or other problems	School or field trips	20,000	Unavailable	Disadvantaged individuals	Funds may not be used for the operation of vehicles

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
Office of Education- Bureau of Occupational and Adult Technical Education	Vocational Education- Innovation	13.502	Develop and operate model occupational education programs	School or field trips	9,849	Unavailable	Students in kindergarten through grade 12 and in junior or community colleges, high school dropouts	Funds may not be used for the operation of vehicles
Office of Education- Bureau of Education for the Handicapped	Educationally Deprived Children- Handicapped	13.427	Strengthen State-operated programs for handicapped children	Education pro- gram sites	95,869	\$ 2,109	Handicapped children under age 21 who have not completed grade 12	Federal officials discourage purchase of transportation equipment
	Handicapped Early Child- hood Assis- tance	13.444	Support experimental pre- school and early child- hood programs	Education pro- gram sites	22,000	1,100	Handicapped children functioning at less than a third grade level	Federal officials encourage lease rather than purchase of transportation equip- ment.
	Handicapped Innovative Programs- Total-Blind Centers	13.465	Establish regional centers to provide special diag- nostic and training services	Classes and diagnostic centers	16,000	35	Aurally or visually handicapped children, or those with learning disabilities	

105

APPENDIX II

APPENDIX II

APPENDIX II

APPENDIX II

STATE OF INDEMNIFICATION PROGRAMS THAT FIT FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS

State	Program Title	Program Goals	Estimated Program Obligations (700,000)	Estimated Transportation Costs (700,000)	Major Client Eligibility Criteria	Other Program Information
Illinois	Handicapped Children	Provide transportation services for handicapped children, including preschool, elementary and secondary school children.	100,000	2,145	Handicapped children.	
Illinois	Severely Handicapped Children and Youth	Provide and expand educational services for severely handicapped children and youth.	3,250	34	Severely handicapped children and youth.	
Illinois	Disadvantaged Children in Low-Income Areas	Provide and improve programs to meet needs of educationally disadvantaged elementary and secondary students.	\$1,625,413	\$ 4/16,989	Disadvantaged children in low-income areas.	Funds may not be used to purchase transportation equipment.
			\$ 237,119	\$ 5,423		

INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
Department of Health, Education and Welfare Office of Education Elementary and Secondary Education	Educationally Deprived Children-Migrants	13.431	Expand and improve educational programs to meet the needs of children of migratory agricultural workers or fishermen	Occasional field trips and other schools	\$ 97,000	\$ 2/1,015	Children of migratory agricultural workers or of migratory fishermen	Funds may not be used to purchase transportation equipment
	Educationally Deprived Children in State Administered Institutions serving Neglected or Delinquent Children	13.431	Expand and improve educational programs to meet the needs of institutionalized children	Occasional field trips and other schools	27,459	2/277	All children placed in a State institution for the neglected or delinquent or in an adult correctional institution	Funds may not be used to purchase transportation equipment
	Follow-Through	13.433	Sustain and augment in primary grades gains children from low-income families make in Head Start and other preschool programs	Supplement local agency transportation	59,000	100	Children of low-income families, with at least half being graduates of a full-year Head Start or similar preschool program	
	Educationally Deprived Children-Special Incentive Grants	13.512	Stimulate increased State and local funding for elementary and secondary education	Occasional field trips and other schools	\$ 16,374	\$ 2/166	Educationally deprived children	Funds may not be used to purchase transportation equipment
					<u>11,825,336</u>	<u>2/18,547</u>		

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Age	Program title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
18-24	Special Services for Disadvantaged Students	13.482	Assist low-income students, physically handicapped students, and/or students with limited English-speaking ability with postsecondary education	Occasional field trips	\$ 23,000	Unavailable	Students with academic potential who need services to help them with their postsecondary education	
	Talent Search	13.488	To identify youths of financial or cultural need with exceptional potential for postsecondary educational training and assist them in obtaining admission to post secondary schools	Visit colleges and orient new students	6,000	Unavailable	Secondary school students of financial or cultural need with exceptional potential for postsecondary education.	
	Upward Bound	13.492	Generate skill and motivation for educational success beyond high school among low-income young people	Field trips and to and from home	38,331	\$ 4,791	Students must meet income criteria and be characterized as academic risks for college education	Funds may not be used to purchase transportation equipment
					\$ 67,331	\$ 4,791		
	Indian Education - Grants to Local Educational Agencies	13.536	Provide elementary and secondary school programs for special educational needs of Indian children	Project site or educational activities	22,700	1,135	Indian children enrolled in local educational agencies	

Q.C.

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
Office of Education- Office of Indian Education-Continued	Indian Education-Special Programs and Projects	13.535	Improve educational opportunities for Indian children	Education site and field trips	\$ 12,000	\$ 300	Indian children	
	Indian Education-Adult Indian Education	13.536	Plan, develop and implement programs for Indian adults	Education site and field trips	3,000	75	Indians at least 16 years old	
	Indian Education-Grants to Non-local Educational Agencies	13.551	Provide elementary and secondary school programs for Indian children	Education site and field trips	2,270	11	Indian children	
					<u>\$ 39,970</u>	<u>\$ 1,521</u>		
Subtotal								
Office of Education- Office of Career Education	Career Education	13.554	Demonstrate the most effective career education techniques and methods	Work sites	10,135	12	Students in career education programs	
Total, Office of Education					<u>\$ 2,728,431</u>	<u>\$ 30,969</u>		

63

APPENDIX II

APPENDIX II

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program	Catalog number	Program goal's	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs (000 omitted)	Major client eligibility criteria	Other program information
Office of Economic Opportunity	Child Development-Head Start	13.600	Provide comprehensive health, educational, nutritional, social and other services to pre-school economically disadvantaged children and their families	Head Start centers or field trips	\$ 461,500	\$ 64,610	Children age 3 to age of compulsory school attendance. At least 90 percent of them shall be from low-income families, and not less than 10 percent of enrollment must be available for handicapped children.	
	Native American Programs	13.612	To promote economic and social self-sufficiency for American Indians, Native Hawaiians and Alaskans	Social services funded with Native Americans Program funds	26,100	1,300	An American Indian, Native Hawaiian or Alaskan	
	Runaway Youth	13.623	To develop local facilities to address the immediate needs of runaway youth in a manner which is outside the law enforcement and juvenile justice systems	Social services, court, sheltered homes or their own homes	7,000	Unavailable	Runaway youths under 18 who leave home without permission	
	Rehabilitation services and facilities-Basic Support Program	13.624	To provide vocational rehabilitation services to persons with mental and physical handicaps	Vocational rehabilitation services such as sheltered workshops	720,309	b/24,491	Persons with a physical or mental disability that constitutes or results in a substantial handicap to employment	

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs (000 omitted)	Major client eligibility criteria	Other program information
U.S. Department of Health, Education and Welfare (Continued)	Vocational Rehabilitation Services for Social Security Disability Beneficiaries	13,625	Provide necessary rehabilitation services to disabled beneficiaries to enable their return to gainful employment	Vocational rehabilitation services	\$ 102,592	Unavailable	Disabled individuals who receive benefits under the Social Security Disability Beneficiary Program or under the Supplemental Security Income Program	
	Supplemental Security - Vocational Rehabilitation Program	Not assigned	Provide necessary rehabilitation services to Social Security Income beneficiaries	Vocational rehabilitation services	52,722	Unavailable	Supplemental Security Income recipients who have rehabilitation potential	
	Developmental Disabilities - Basic Support	13,630	Help States meet needs of persons disabled by mental retardation or a neurological condition which originates before age 18	Needed services such as sheltered workshops and diagnostic centers	31,538	\$ 946	Persons having mental retardation, cerebral palsy, epilepsy, autism, and similar conditions which originated before age 18	
	Developmental Disabilities - Special Projects	13,631	Demonstrate new or improved service techniques	A conference or as part of a demonstration project	13,610	Unavailable	Persons with developmental disabilities	25 percent of funds are to be used for projects of National significance
	Developmental Disabilities - Demonstration Facilities and Training (University Affiliated Facilities)	13,632	To train people to give specialized services to persons with developmental disabilities	A university affiliated treatment facility for tests	4,250	Unavailable	Persons with developmental disabilities	

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
Department of Human Resources (Continued)	Special Programs for the Aging-State Agencies Activities and Area Planning and Social Service Programs (Title III)	13,633	Help State and local agencies develop comprehensive and coordinated social service systems for older persons	Facilitate access to other services	\$ 110,000	\$ 15,624	Elderly persons	
	Special programs for the Aging-Title III, section 306 (Model Protection Act)	13,634	Demonstrate new approaches, techniques and methods which hold promise to contribute toward meaningful living for the elderly	Senior citizens centers and medical clinics	13,800	855	Elderly persons	
	Special programs For The Aging-Nutrition Programs For The Elderly (Title VII)	13,635	To provide older Americans with low cost nutrition meals, health services, education and counseling, outreach socialization and recreation	Nutrition sites and recreation centers	111,711	2,5680	Persons 60 or over and their spouses	Only 20 percent of a State's allotment for Title VII can be used for supportive services including transportation
Subtotal					<u>\$1,655,132</u>	<u>\$ 113,506</u>		

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Statutory Authority	Program Description	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs (000 omitted)	Major client eligibility criteria	Other program information
Public Health Service Alcoholism and Drug Abuse Administration	Drug Abuse Treatment Centers	13.235	Provide drug abuse treatment and rehabilitation	Drug treatment centers	\$ 122,135	Unavailable	Narcotic addicts and drug dependent persons	Federal officials encourage leasing rather than purchasing vehicles
	Mental Health Hospital Improvement Grants	13.237	Support State mental hospital projects	Mental health facilities	5,119	\$ 104	Persons in need of mental health services	Transportation is an optional service depending on the project within a State's mental hospital program
	Narcotic Addict Rehabilitation Act Contracts	13.239	Provide civil commitment and after-care services to addicts	Drug treatment centers	764	Unavailable	Narcotic addicts	Federal officials encourage leasing rather than purchasing vehicles
	Community Mental Health Centers Staffing and Construction	13.240	Provide facilities and improve organization and allocation of mental health services	Community mental health services	132,830	Unavailable	Persons who reside in the designated community mental health center area	Funds may not be used to purchase transportation equipment
	Alcohol Demonstration Programs	13.252	Control and prevent alcoholism	Alcohol treatment centers	50,001	2,859	Problem drinkers and their families	
	Alcohol Formula Grants	13.257	Help States plan for alcoholism prevention, treatment and rehabilitation services	Alcohol treatment centers	55,500	Unavailable	People in local communities in need of programs for alcohol abuse and alcoholism	Transportation must support a State's plan

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog Number	Program Goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs (000 omitted)	Major client eligibility criteria	Other program information
Mental Health Services Administration Mental Health Programs	Mental Health Children's Services	13.254	Stimulate innovative approaches to children's mental health problems	Mental health centers	\$ 25,868	Unavailable	Children and their families who need mental health services	Funds may not be used to purchase transportation equipment
	Drug Abuse Prevention Formula Grants	11.269	Support State drug abuse prevention plans	Drug treatment centers	35,000	Unavailable	People in need of drug abuse programs	Transportation is an optional service depending on a State's plan
	Special Alcohol Projects	13.290	Help States in alcohol abuse and alcoholism prevention efforts	Alcohol treatment centers	2,760	\$ 83	People in need of alcohol treatment programs	
	Community Mental Health Centers Comprehensive Services Support	13.295	Provide comprehensive mental health services	Community Mental Health Centers	8,559	Unavailable	Persons in need of mental health services	Funds may not be used to purchase transportation equipment
Subtotal					\$ 438,536	\$ 3,046		
Public Health Service - Center for Disease Control	Childhood Lead-Based Paint Poisoning Control	13.266	Stimulate development of comprehensive lead-based paint poisoning control programs	Clinics or doctors in emergency situations in which lead-based paint poisoning is suspected or has occurred	3,500	Unavailable	Children with elevated blood lead levels	Funds may not be used to purchase or operate transportation equipment

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs (000 omitted)	Major client eligibility criteria	Other program information
Public Health Services Center for Disease Control - Contract	Control- Project Grants	13.26	Support Communicable Disease Control programs	Clinics for vaccine pre- ventable disease tests and/or treat- ment	\$ 24,800	Unavailable	Persons suffering from or suspected of suffering from venereal disease or a vaccine preventable disease	Funds may not be used to purchase or operate trans- portation equip- ment
Public Health Services- Health Services Administration	Comprehensive Public Health Services- Formula Grants	13.210	Help States provide com- prehensive health ser- vices	Various health services	90,000	Unavailable	People in need of health and mental health ser- vices	
	Crippled Children's Services	13.211	Improve medical services to crippled children	Medical ser- vices	76,500	Unavailable	Children under age 21 who are crippled or are suffering from a crip- pling condition	
	Family Planning Projects	13.217	Provide educational, comprehensive medical and social services needed for planned parenthood	Clinics or a physician's office or from clinics to hospital emergency rooms	75,135	Unavailable	Persons desiring family planning services who would not otherwise have access to them	
	Community Health Centers	13.224	Provide comprehensive health services to medically underserved communities	Health centers	196,648	\$ 6,686	Individuals in medically underserved areas	
	Indian Health Services	13.228	Provide full health ser- vices and encourage Indian communities to manage their own health programs	Medical facili- ties	237,387	Unavailable	Members of an eligible tribe, village, group or band of Indians	

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (\$60 omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
Public Health Service - Health Services Administration Division	Maternal and Child Health Services	13.232	Reduce infant mortality and retardation and improve the health of mothers and children	Medical services	\$ 219,200	Unavailable	Mothers and children in need of health care	
	Migrant Health Grants	13.246	Provide medical care for migrant workers and their families	Health centers	25,000	\$ 900	Migratory and seasonal agricultural workers and their families	
	Emergency Medical Services	13.284	Provide area-wide emergency medical services systems nationally and improve patient care	Hospitals on an emergency basis	29,115	Unavailable	Citizens served by regional emergency medical services systems	
	Subtotal				\$ 948,985	\$ 7,586		
Public Health Service - National Institutes of Health	Cancer Centers Support	13.397	Establish cancer centers	Cancer treatment centers	33,669	Unavailable	Cancer patients	
	Total, Public health service				\$1,440,400	\$ 10,632		
Department of Rehabilitation Services	Child Welfare Services (Title IV-B)	13.707	Establish, extend, and strengthen services provided by public welfare programs to prevent neglect, abuse, exploitation or delinquency of children	Foster children to get to services or to visit parents or to return runaway youth to their homes	46,000	Unavailable	Families and children in need of services	Funds may not be used to purchase transportation equipment

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
<u>Social and Rehabilitation Services - Continued</u>	Medical Assistance Program-Medicaid (Title XIX)	13.714	Help States pay medical assistance on behalf of cash assistance recipients or other medically needy	Emergency and non-emergency medical service	\$ 8,456,000	Unavailable	Most persons receiving Supplemental Security Income; all persons receiving Aid to Families with Dependent Children	
	Work Incentive Program- Child Care-Employment Related Supportive Services	13.748	Provide child care and needed services to Aid to Families with Dependent Children recipients who are WIN registrants	Social services such as child-care, family planning and counseling	115,000	\$ 41,100	Welfare recipients covered by Aid to Families with Dependent Children who are required to or voluntarily register for work or training	Funds may not be used to purchase or operate transportation equipment
	Public Assistance-Social services	13.754	Provide potential and current public assistance recipients services to enable them to attain or retain the least level of dependence on public assistance	Social or medical services	15,548	Unavailable	Any person in Guam, Puerto Rico, or Virgin Islands who may become recipients of welfare funds for the blind, disabled, aged, or a dependent child	Funds may not be used to purchase transportation equipment
	Public Assistance-Maintenance Assistance (State Aid)	13.761	Provide Federal financial assistance to States for Public Maintenance	Clients as a work expense or for special needs, such as for medical trips	5,897,604	Unavailable	Needy families with dependent children deprived of parental support or care and families with children needing emergency welfare assistance; destitute repatriates. In Guam, Puerto Rico, and the Virgin Islands, only the needy who are aged, blind, permanently or totally disabled are eligible.	Funds may not be used to purchase or operate transportation equipment. Transportation is an item to be deducted in calculating an Aid to Families with Dependent Children payment computation for "earned income."

APPENDIX II

APPENDIX II

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs (000 omitted)	Major client eligibility criteria	Other program information
Social and Rehabilitative Administration (continued)	Social Services for Low Income and Public Assistance Recipients (Title XX)	13.771	Help States provide social services to public assistance recipients and other low income persons	Social services such as day care centers, health clinics, meal sites	\$2,199,000	\$ 33,600	Recipients of Aid to Families with Dependent Children, Supplementary Security Income, or State supplementary payment recipients and those eligible for Medicaid	Funds may not be used to purchase transportation equipment
	Refugee Assistance-Cuban Refugees	13.762	Help Cuban refugees find homes, training, and jobs and alleviate financial impact on State and local resources for welfare and medical assistance to refugees	Resettle Cuban refugees	84,700	45	Cuban refugees lawfully admitted to the U.S.	
	Special Assistance to Refugees from Cambodia and Vietnam in the United States	13.769	To help refugees from Cambodia and Vietnam settle throughout the country	Job interviews, doctors' offices and other places	96,781	Unavailable	Vietnam and Cambodian refugees in alien status with documentation evidencing their refugee status	
	Subtotal				<u>\$16,910,633</u>	<u>\$ 36,745</u>		
					<u>\$22,743,686</u>	<u>\$ 189,852</u>		

TOTAL DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
<u>DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT:</u> <u>Office of Community Planning and Development</u>	Community Development Block Grants Entitlement Grants	14.218	Develop decent housing and expand economic opportunities principally for low and moderate income persons	Various community projects, also, general purpose transportation offered	\$ 2,353,105	\$ 6,468	Persons meeting the poverty levels set by Office of Management and Budget and who live in over-crowded housing areas	Funds can be used for transportation only after all other available sources have been exhausted
	TOTAL, DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT					\$ <u>2,353,105</u>	\$ <u>6,468</u>	
DEPARTMENT OF INTERIOR								
<u>Bureau of Indian Affairs</u>	Indian Employment Assistance	15.108	Develop vocational training and employment opportunities	Jobs or vocational training sites on or off the reservation	33,221	<u>a/1,276</u>	Persons with 1/4 or more Indian blood with priority given to those living on or near an Indian reservation	
	Indian Education - Territory Operations	15.109	Assure housing for children attending public schools	School	6,000	<u>a/222</u>	Children with 1/4 or more Indian blood	
	Indian Education - Federal Schools	15.110	Develop educational opportunities for Indian children	School	132,541	<u>a/4,892</u>	Children with 1/4 or more Indian blood	

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000)	Estimated transportation costs (000)	Major client eligibility criteria	Other program information
<u>Bureau of Indian Affairs- Continued</u>	Indian Education-Assistance To Schools	15.130	Assure adequate educational opportunities for Indian children attending public schools and tribally operated schools	School	\$ 30,952	\$ 71	Children with 1/4 or more Indian blood with priority given to those living on or near Indian reservations	Funds may not be used to purchase transportation equipment
TOTAL, DEPARTMENT OF INTERIOR					\$ <u>202,714</u>	\$ <u>6,371</u>		
DEPARTMENT OF JUSTICE								
<u>Law Enforcement Assistance Administration</u>	Juvenile Justice Delinquency Prevention Special Emphasis Prevention and Treatment	16.517	Develop and implement approaches to prevent juvenile delinquency	Services, counseling, and recreation	21,875	219	Persons under age 18	
TOTAL, DEPARTMENT OF JUSTICE					\$ <u>21,875</u>	\$ <u>219</u>		

08

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs	Major client eligibility criteria	Other - program information
<u>DEPARTMENT OF LABOR</u>								
<u>Employment and Training Administration</u>	Apprenticeship Outreach	17.200	Promote employment of minorities through use of apprenticeship programs	Program activities	\$ 13,591	Unavailable	Economically disadvantaged, unemployed or underemployed persons	Federal officials discourage the purchase of transportation equipment and discourage contracting with third parties to provide transportation. Generally, transportation is provided only for the first week in the program
	Employment Service	17.207	Provide services to individuals for employment preparation and/or placement and to employers seeking qualified individuals	Job interviews, primarily	573,200	Unavailable	Persons seeking employment	
	Job Corps	17.211	Assist young individuals who need and can benefit from an intensive educational and vocational training program	Assignment center, home, place of employment and related activities	14,702	\$ 4,400	Persons age 16 through 21 who are economically disadvantaged or are from such a family and who are free of serious behavioral disorders	The agency encourages leasing transportation vehicles rather than purchase of vehicles

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
<u>Employment and Training Administration</u> <u>Continued</u>	Work Incentive Program (WIN)	17.226	Move Aid to Families with Dependent Children recipients to employment by training, social services, job placement and other services	Job or training sites	\$ 400,000	\$ 1,900	Welfare recipients covered by Aid to Families with Dependent Children	The program pays for training related expenses including at least \$1 a day for travel
	National On-The-Job Training	17.228	Provide occupational training for unemployed and underemployed persons	Program activities	12,311	Unavailable	Persons age 16 or over who are economically disadvantaged, unemployed or underemployed	Federal officials discourage the purchase of equipment and discourage contracting with third parties to provide transportation. Generally, transportation is provided only for the first week in the program
	Farm Workers (migrant and other seasonally employed farm worker programs)	17.230	Enable migrant farm workers to find economically viable alternatives to seasonal agricultural labor	Program-related activities	75,704	Unavailable	Economically disadvantaged farm workers and their dependents who during the 18 months preceding their application, had earned at least 50 percent of income for 12 consecutive months as farm workers	

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
Employment and Training Administration Continued	Comprehensive Employment and Training Programs (CETA)	17.232	Provide job training and employment opportunities for economically disadvantaged, unemployed, or underemployed persons	Work sites, training centers, educational centers, and counseling	\$ 5,333,420	Unavailable	Persons economically disadvantaged and who are unemployed for 30 days or who are underemployed	
	Employment and Training Research and Development Projects	17.233	Support employment and training studies	Relocate and find a job	14,233	Unavailable	Unemployed, underemployed and workers displaced because of foreign imports	
	Indian Employment and Training Programs	17.234	Assist Indians or others of Native American descent through employment and training programs	Employment and training programs	61,778	Unavailable	Economically disadvantaged unemployed or underemployed Indians or Native Americans	
	Senior Community Service Employment Program (Title IX)	17.235	Provide work opportunities in community service activities for low-income persons age 55 and older who are economically disadvantaged	Employment or employment-related activities	30,000	Unavailable	Economically disadvantaged persons age 55 or over	Funds may not be used to purchase or operate transportation equipment
Subtotal					\$ 6,655,979	\$ 9,300		

83

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 75

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
Bureau of International Labor Affairs	Trade Adjustment Assistance-Workers	17.400	Assist workers adversely affected by increase in imports of goods competitive with that produced by workers' firm	Training conducted outside the local community	\$ 60,000	Unavailable	Workers adversely affected by imports	Funds may not be used to purchase or operate transportation equipment. Transportation is generally provided through client reimbursement
TOTAL, DEPARTMENT OF LABOR					<u>\$ 60,000</u>	<u>—</u>		
DEPARTMENT OF TRANSPORTATION						<u>\$ 8,300</u>		
Federal Highway Administration	Rural Highway Public Transportation Demonstration Program (section 147)	Not assigned	Increase mobility of people in rural areas	A variety of destinations	15,000	15,000	General public	Only for areas of 50,000 or less people. Funds available for operations are limited to 30 percent of total program obligation, but there is no limit on a project by project basis
	Carpool Demonstration Projects	Not assigned	Enhance use of existing highways and parking facilities	Work, generally	539	539	General public	Vehicles must be suitable for pooling. Funds may not be used for the operation of vehicle.
Total, Federal Highway Administration					<u>\$ 15,539</u>	<u>\$ 1,539</u>		

24

APPENDIX II

APPENDIX II

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs (000 omitted)	Major client eligibility criteria	Other program information
<u>Urban Mass Transportation Administration</u>	Capital Improvement Grants-Section 3 Grants	20.500	Acquire, construct or improve mass transit facilities	A variety of destinations	\$1,091,337	\$1,091,337	General public	Funds may not be used for operating equipment
	Capital Improvement Loans	20.501	Acquire, construct or improve mass transit facilities	A variety of destinations	816	816	General public	Funds may not be used for operating equipment
	Urban Mass Transportation Demonstration Grants	20.506	Demonstrate new mass transit facilities techniques and methods	A variety of destinations	7,000	7,000	General public	
	Urban Mass Transportation Capital and Operating Assistance Formula Grants-Section 5 Grants	20.507	Acquire, construct or improve mass transit facilities or pay operating expense to improve or continue mass transit service	A variety of destinations	390,200	390,200	General public	Only for areas of 50,000 or more people
	Capital Assistance To Private Nonprofit Organizations-Section 16(b)(2)	Not assigned	Acquire mass transit facilities for elderly and handicapped people	A variety of destinations	d/22,000	d/22,000	For elderly and handicapped persons. Others may ride on an "incidental" basis	Funds may not be used for operating equipment

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
<u>Urban Mass Transportation Administration</u> Continued	Interstate Transfer Grants	Not assigned	Substitute mass transit projects for Interstate Highway segments	A variety of destinations	\$ 337,495	\$ 337,495	General public	Only for areas of 50,000 or more people. Funds may not be used for the operation of vehicles
	Urban Systems Grants	Not assigned	Federal-Aid Highway funds for mass transit and transit related facilities and special use highways	A variety of destinations	23,438	23,438	General public	Funds may not be used for the operation of vehicles
Total, Urban Mass Transportation Administration					\$ 1,872,286	\$ 1,872,286		
<u>National Highway Traffic Safety Administration</u>	State and Community Highway Safety Program	20.600	Provide coordinated national highway safety	Hospitals on an emergency basis	99,671	3,349	Must be sick or injured	Only ambulances can be purchased
TOTAL, DEPARTMENT OF TRANSPORTATION					\$ 1,987,696	\$ 1,891,174		
<u>ACTION</u>	Foster Grandparents	72.001	For the elderly poor, develop volunteer opportunities to help children	Volunteer assignments and for official project activities	28,347	4,774	Low-income persons age 60 and over	Children receiving Foster Grandparent care are not eligible for transportation

86

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
ACTION- Continued	Retired Senior Volunteer Program (RSVP)	72.002	Develop community service opportunities for retirees	Project sites	\$ 17,500	Unavailable	Persons age 60 or over who are retired and able to work	Recipients of RSVP services are not eligible for transportation services. There is a \$1.75 a day limit per volunteer for transportation
	Volunteers In Service To America (VISTA)	72.003	Supplement community efforts to eliminate poverty through full-time volunteers	Project sites	22,300	\$ 744	Volunteers	Funds may not be used to purchase transportation equipment. Recipients of VISTA services are not eligible for transportation services. Volunteers are paid 12¢ per mile only if the subject where the volunteer works cannot pay for the transportation
	Senior Companion Program (SCP)	72.008	Provide companion for adult with special needs	Project sites	4,545	351	Retired volunteers age 60 or over who meet ACTION poverty guidelines and can pass an annual physical examination	Recipients of SCP services are not eligible for transportation services

SUMMARY OF FEDERAL PROGRAMS THAT PROVIDE TRANSPORTATION
IN SUPPORT OF PROGRAM GOALS
FISCAL YEAR 1976

Agency	Program Title	Catalog number	Program Goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs (000 omitted)	Major client eligibility criteria	Other program information
<u>ACTION-Continued</u>	Mini-Grants	72.010	Mobilize volunteers	Project sites	\$ 500	\$ 50	Volunteers	Grants cannot exceed \$5,000.
TOTAL, ACTION					\$ <u>73,192</u>	\$ <u>5,919</u>		
<u>APPALACHIAN REGIONAL COMMISSION</u>	Appalachian Health Programs	23.004	Develop and implement health demonstration projects in Appalachia	Comprehensive health care facilities	37,942	266	Recipients of health and child development services	Project must be experimental, limited to 5 years, and operated within the Appalachian Region.
	Appalachian State research, Technical Assistance and Demonstration Projects	23.011	Improve economy of Appalachia through research, technical assistance and demonstration projects	Social Services	8,761	70	People who reside in an Appalachian State	
	Appalachian Child Development	23.013	Provide child development services and help States plan for these services	Day care centers, school medical centers	20,312	1,219	Children up to age 6 and their mothers	
TOTAL, APPALACHIAN REGIONAL COMMISSION					\$ <u>67,015</u>	\$ <u>1,555</u>		

00
00

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs (000 omitted)	Major client eligibility criteria	Other program information
<u>COMMUNITY SERVICES ADMINISTRATION</u>	Community Action- (Sections 212 and 221)	49.002	Enable the poor to participate in community activities; eliminate poverty	A variety of social services	\$ 30,000	\$ 15,180	Low-income families and individuals who meet CSA poverty guidelines	
	Community Food and Nutrition	49.005	Eliminate hunger and malnutrition among poor	Nutritional and medical services	26,200	550	Persons suffering from hunger or malnutrition	
	Senior Opportunities and Services (SOS)	49.010	Fulfill needs of elderly poor persons	Senior citizen centers, food stamp centers, and other elderly programs	10,000	Unavailable	Low-income persons age 60 or older	
	State Economic Opportunity Services	49.013	Help States assist poor	A variety of social services	12,000	Unavailable	Low-income families	Funds may not be used to purchase transportation equipment
TOTAL, COMMUNITY SERVICES ADMINISTRATION				\$ <u>378,200</u>	\$ <u>15,730</u>			
<u>SMALL BUSINESS ADMINISTRATION</u>	Service Corps of Retired Executives and Active Corps of Executives	59.026	Utilize experience of active and retired businessmen	Project sites	635	448	Program volunteers	Funds may not be used to purchase transportation equipment
TOTAL, SMALL BUSINESS ADMINISTRATION				\$ <u>635</u>	\$ <u>448</u>			

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (000 omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
VETERANS ADMINISTRATION								
<u>Department of Medicine and Surgery</u>	Community Nursing Home Care	64.002	Provide nursing home care and aid in hospital-to-home transition	Nursing facilities	\$ 58,926	\$ 838	Veterans with service-connected illnesses or injuries	Funds may not be used to purchase transportation equipment.
	Blind Veterans Rehabilitation Centers	64.007	Provide social and health services	Rehabilitation centers	2,430	a/35	Veterans blinded from a service-connected injury	Funds may not be used to purchase transportation equipment
	Veterans Home Care	64.008	Aid in returning to community through medical and social services	Medical and social service centers	59,479	a/846	Veterans disabled from a war injury, unemployed, or having no adequate means of support	Funds may not be used to purchase transportation equipment
	Veterans Hospitalization	64.009	Provide medical care for veterans and/or dependents	Treatment Center	2,540,435	a/36,263	Veterans disabled or age 65 and over and qualified veterans' families	Funds may not be used to purchase transportation equipment
	Veterans Nursing Home Care	64.010	Provide nursing home care for those not requiring hospitalization	Nursing homes	124,323	a/1,768	Veterans requiring skilled nursing care	Funds may not be used to purchase transportation equipment
	Veterans Outpatient Care	64.011	Provide outpatient services	Outpatient clinics	732,993	a/10,425	Veterans with a service-connected injury, military retirees, and qualified veterans' families	Funds may not be used to purchase transportation equipment

SUMMARY OF INFORMATION ON FEDERAL PROGRAMS THAT PROVIDE FOR TRANSPORTATION OF PEOPLE
IN SUPPORT OF PROGRAM GOALS
FY 76

Agency	Program Title	Catalog number	Program goals	Provide transportation to	Estimated program obligations (COO omitted)	Estimated transportation costs	Major client eligibility criteria	Other program information
<u>Department of Medicine and Surgery-Continued</u>	Veterans Rehabilitation-Alcohol and Drug Dependence	64.019	Provide medical, social, and vocational services for alcohol and/or drug dependent veterans	Rehabilitation centers	\$ 91,314	\$ 1,299	Veterans with alcohol or drug dependence	Funds may not be used to purchase transportation equipment
Total, Department of Medicine and Surgery					\$ 91,314	\$ 1,299		
<u>Department of Veterans Benefits</u>	Automobiles and Adaptive Equipment for Certain Disabled Veterans and Members of the Armed Forces	64.100	Provide financial aid for purchase of automobile plus adaptive equipment	Anywhere	21,150	21,150	Veterans and active service personnel who have a service-connected disability and meet certain eligibility requirements	One-time direct payment not to exceed \$3,300 for an automobile, and an additional amount for adaptive equipment. Funds are not provided for the operation of vehicles
Total, Department of Veterans Benefits					21,150	21,150		
	Vocational Rehabilitation For Disabled Veterans	64.116	Restore employability	Centers for vocational counseling and other rehabilitation services	78,686	600	Veterans with a service-connected disability who need vocational rehabilitation	
TOTAL, VETERANS ADMINISTRATION					99,836	21,750		
GRAND TOTAL OF ALL PROGRAMS					\$ 1,718,936	\$ 73,224		
					\$ 18,262,833	\$ 2,199,260		

01

CONGRESSIONAL COMMITTEES WITH AN INTEREST
IN PROGRAMS THAT PROVIDE
TRANSPORTATION FOR PROGRAM BENEFICIARIES

The following list shows the Senate and House legislative committees and appropriation subcommittees of the 95th Congress that have an interest in the programs we identified as providing transportation for program beneficiaries. The Catalog of Federal Domestic Assistance identification number and program name for each of the 114 programs are listed under the legislative committee and again under the appropriation subcommittee.

SENATE

Committee on Appropriations:

Subcommittee on HUD and Independent Agencies:

14.218	Community Development Block Grants
64.002	Community Nursing Home Care
64.007	Blind Veterans Rehabilitation Centers
64.008	Veterans Domiciliary Care
64.009	Veterans Hospitalization
64.010	Veterans Nursing Home Care
64.011	Veterans Outpatient Care
64.019	Veterans Rehabilitation - Alcohol and Drug Dependence
64.100	Automobiles and Adaptive Equipment for Certain Disabled Veterans of the Armed Forces
64.116	Vocational Rehabilitation for Disabled Veterans

Subcommittee on Interior:

13.228	Indian Health Services
13.534	Indian Education Grants to Local Educational Agencies
13.535	Indian Education - Special Programs and Projects
13.536	Indian Education - Adult Indian Education
13.551	Indian Education - Grants to Nonlocal Educational Agencies
15.108	Indian Employment Assistance
15.109	Indian Education Dormitory Operations
15.110	Indian Education - Federal Schools
15.130	Indian Education - Assistance to Schools

Subcommittee on Labor, and Health, Education, and Welfare:

- 13.210 Comprehensive Public Health Services - Formula Grants
- 13.211 Crippled Children's Services
- 13.217 Family Planning Projects
- 13.224 Community Health Centers
- 13.232 Maternal and Child Health Services
- 13.235 Drug Abuse Community Service Program
- 13.237 Mental Health Hospital Improvement Grants
- 13.239 Narcotic Addict Rehabilitation Act Contracts
- 13.240 Community Mental Health Centers - Staffing and Construction
- 13.246 Migrant Health Grants
- 13.252 Alcohol Demonstration Programs
- 13.257 Alcohol Formula Grants
- 13.259 Mental Health - Children's Services
- 13.260 Childhood Lead-Based Paint Poisoning Control
- 13.268 Disease Control - Project Grants
- 13.269 Drug Abuse Prevention Formula Grants
- 13.281 Emergency Medical Services
- 13.290 Special Alcohol Projects
- 13.295 Community Mental Health Centers - Comprehensive Services Support
- 13.397 Career Centers Support
- 13.400 Adult Education - Grants to States
- 13.427 Educationally Deprived Children - Handicapped
- 13.428 Educationally Deprived Children - Local Education Agencies
- 13.429 Educationally Deprived Children - Migrants
- 13.431 Educationally Deprived Children in State Administered Institutions Serving Neglected or Delinquent Children
- 13.433 Follow-through
- 13.444 Handicapped Early Childhood Assistance
- 13.445 Handicapped Innovative Programs - Deaf-Blind Centers
- 13.449 Handicapped Preschool and School Programs
- 13.482 Special Services for Disadvantaged Students
- 13.488 Talent Search
- 13.492 Upward Bound
- 13.493 Vocational Education - Basic Grants to States
- 13.495 Vocational Education - Cooperative Education
- 13.498 Vocational Education Research
- 13.499 Vocational Education - Special Needs
- 13.502 Vocational Education Innovation
- 13.512 Educationally Deprived Children - Special Incentive Grants

Subcommittee on Labor, and Health, Education, and Welfare
(continued):

- 13.554 Career Education
- 13.568 Handicapped Innovative Programs - Programs for Severely Handicapped Children
- 13.600 Child Development - Head Start
- 13.612 Native American Programs
- 13.623 Runaway Youth
- 13.624 Rehabilitation Services and Facilities - Basic Support Program
- 13.625 Vocational Rehabilitation Service for Social Security Disability Beneficiaries
- 13.630 Developmental Disabilities - Basic Support
- 13.631 Developmental Disabilities - Special Projects
- 13.632 Developmental Disabilities Demonstration Facilities and Training (University Affiliated Facilities)
- 13.633 Special Programs for the Aging - State Agencies Activities and Area Planning and Social Service Programs (Title III)
- 13.634 Special Programs for the Aging - Title III, sec. 308 (Model Projects on Aging)
- 13.635 Special Programs for the Aging - Nutrition Programs for the Elderly (Title VII)
- Supplemental Security - Vocational Rehabilitation Program
- 13.707 Child Welfare Services (Title IV-B)
- 13.714 Medical Assistance Program - Medicaid (Title XIX)
- 13.748 Work Incentive Program - Child Care-Employment-Related Support Services (WIN)
- 13.754 Public Assistance Social Services
- 13.761 Public Assistance Maintenance Assistance (State Aid)
- 13.762 Refugee Assistance - Cuban Refugees
- 13.769 Special Assistance to Refugees from Cambodia and Vietnam in the United States
- 13.771 Social Services for Low-Income Public Assistance Recipients (Title XX)
- 17.200 Apprenticeship Outreach
- 17.207 Employment Service
- 17.211 Job Corps
- 17.226 Work Incentive Program (WIN)
- 17.228 National On-the-Job Training
- 17.230 Farm Workers (migrant and other seasonally employed farm worker programs)
- 17.232 Comprehensive Employment and Training Programs
- 17.233 Employment and Training Research and Development Projects
- 17.234 Indian Employment and Training Programs

Subcommittee on Labor, and Health, Education, and Welfare
(continued):

17.235 Senior Community Service Employment Program
(Title IX)
17.400 Trade Adjustment Assistance Workers
49.002 Community Action
49.005 Community Food and Nutrition
49.010 Senior Opportunities and Services
49.013 State Economic Opportunity Services
72.001 Foster Grandparents
72.002 Retired Senior Volunteer Program (RSVP)
72.003 Volunteers in Service to America (VISTA)
72.008 Senior Companion Program
72.010 Mini-Grants

Subcommittee on Public Works:

23.004 Appalachian Health Programs
23.011 Appalachian State Research, Technical Assistance
and Demonstration Projects
23.013 Appalachian Child Development

Subcommittee on State, Justice, Commerce, Judiciary:

16.517 Juvenile Justice and Delinquency Prevention -
Special Emphasis Prevention and Treatment
59.026 Service Corps of Retired Executives and Active
Corps of Executives

Subcommittee on Transportation:

20.500 Capital Improvement Grants
20.501 Capital Improvement Loans
20.506 Urban Mass Transportation Demonstration Grants
20.507 Urban Mass Transportation Capital and Operating
Assistance Formula Grants
20.600 State and Community Safety Program
- Rural Highway Public Transportation Demonstration
Program
- Carpool Demonstration Grants
- Capital Assistance to Private Nonprofit
Organizations - sec. 16(b)(2)
- Interstate Transfer Grants
- Urban Systems Grants

Committee on Banking, Housing and Urban Affairs:

14.218 Community Development Block Grants/Entitlement
Grants
20.500 Capital Improvement Grants

Committee on Banking, Housing and Urban Affairs (continued):

- 20.501 Capital Improvement Loans
- 20.506 Urban Mass Transportation Demonstration Grants
- 20.507 Urban Mass Transportation Capital and Operating Assistance Formula Grants
- Capital Assistance to Private Nonprofit Organizations - sec. 16(b)(2)

Committee on Commerce, Science, and Transportation:

- 20.600 State and Community Safety Program

Committee on Environment and Public Works:

- Rural Highway Public Transportation Demonstration Program
- Carpool Demonstration Grants
- Interstate Transfer Grants
- Urban Systems Grants
- 23.004 Appalachian Health Programs
- 23.011 Appalachian State Research, Technical Assistance and Demonstration Projects
- 23.013 Appalachian Child Development

Committee on Finance:

- 13.707 Child Welfare Services (Title IV-B)
- 13.714 Medical Assistance Program - Medicaid (Title XIX)
- 13.748 Work Incentives Program - Child Care - Employment-Related Supportive Services
- 13.754 Public Assistance Social Services
- 13.761 Public Assistance - Maintenance Assistance (State Aid)
- 13.771 Social Services for Low-Income and Public Assistance Recipients (Title XX)
- 17.400 Trade Adjustment Assistance - Workers

Committee on Human Resources:

- 13.210 Comprehensive Public Health Services - Formula Grants
- 13.211 Crippled Children's Services
- 13.217 Family Planning Projects
- 13.224 Community Health Centers
- 13.232 Maternal and Child Health Services
- 13.235 Drug Abuse Community Service Program
- 13.237 Mental Health Hospital Improvement Grants
- 13.239 Narcotic Addict Rehabilitation Act Contracts

Committee on Human Resources (continued):

- 13.240 Community Mental Health Centers - Staffing
and Construction
- 13.246 Migrant Health Grants
- 13.252 Alcohol Demonstration Programs
- 13.257 Alcohol Formula Grants
- 13.259 Mental Health - Children's Services
- 13.266 Childhood Lead-Based Paint Poisoning Control
- 13.268 Disease Control - Project Grants
- 13.269 Drug Abuse Prevention Formula Grants
- 13.284 Emergency Medical Services
- 13.290 Special Alcohol Projects
- 13.295 Community Mental Health Centers - Comprehensive
Services Support
- 13.397 Career Centers Support
- 13.400 Adult Education - Grants to States
- 13.427 Educationally Deprived Children - Handicapped
- 13.428 Educationally Deprived Children - Local Education
Agencies
- 13.429 Educationally Deprived Children - Migrants
- 13.431 Educationally Deprived Children in State Admin-
istered Institutions Serving Neglected or
Delinquent children
- 13.433 Follow-through
- 13.444 Handicapped Early Childhood Assistance
- 13.445 Handicapped Innovative Programs - Deaf-Blind
Centers
- 13.449 Handicapped Preschool and School Programs
- 13.482 Special Services for Disadvantaged Students
- 13.488 Talent Search
- 13.492 Upward Bound
- 13.493 Vocational Education - Basic Grants to States
- 13.495 Vocational Education - Cooperative Education
- 13.498 Vocational Education Research
- 13.499 Vocational Education - Special Needs
- 13.502 Vocational Education Innovation
- 13.512 Educationally Deprived Children - Special
Incentive Grants
- 13.554 Career Education
- 13.568 Handicapped Innovative Programs - Programs for
Severely Handicapped Children
- 13.600 Child Development - Head Start
- 13.612 Native American Programs
- 13.623 Runaway Youth
- 13.624 Rehabilitation Services and Facilities - Basic
Support Program

Committee on Human Resources (continued):

- 13.625 Vocational Rehabilitation Service for Social Security Disability Beneficiaries
- 13.630 Developmental Disabilities - Basic Support
- 13.631 Developmental Disabilities - Special Projects
- 13.632 Developmental Disabilities Demonstration Facilities and Training (University Affiliated Facilities)
- 13.633 Special Programs for the Aging - State Agencies Activities and Area Planning and Social Service Programs (Title III)
- 13.634 Special Programs for the Aging - Title III, sec. 308 (Model Projects on Aging)
- 13.635 Special Programs for the Aging - Nutrition Programs for the Elderly (Title VII)
- Supplemental Security - Vocational Rehabilitation Program
- 17.200 Apprenticeship Outreach
- 17.207 Employment Service
- 17.211 Job Corps
- 17.226 Work Incentive Program (WIN)
- 17.228 National On-the-Job Training
- 17.230 Farm Workers (migrant and other seasonally employed farm worker programs)
- 17.232 Comprehensive Employment and Training Programs
- 17.233 Employment and Training Research and Development Projects
- 17.235 Senior Community Service Employment Program (Title IX)
- 49.002 Community Action
- 49.005 Community Food and Nutrition
- 49.010 Senior Opportunities and Services
- 49.013 State Economic Opportunity Services
- 72.001 Foster Grandparents
- 72.002 Retired Senior Volunteer Program (RSVP)
- 72.003 Volunteers in Service to America (VISTA)
- 72.008 Senior Companion Program
- 72.010 Mini-Grants

Committee on the Judiciary:

- 13.762 Refugee Assistance - Cuban Refugees
- 13.769 Special Assistance to Refugees from Cambodia and Vietnam in the United States
- 16.517 Juvenile Justice Delinquency Prevention - Special Emphasis Prevention and Treatment

Select Committee on Small Business:

- 59.026 Service Corps of Retired Executives and Active Corps of Executives

Committee on Veterans' Affairs:

- 64.002 Community Nursing Home Care
- 64.007 Blind Veterans Rehabilitation Centers
- 64.008 Veterans Domiciliary Care
- 64.009 Veterans Hospitalization
- 64.010 Veterans Nursing Home Care
- 64.011 Veterans Outpatient Care
- 64.019 Veterans Rehabilitation - Alcohol and Drug
Dependence
- 64.100 Automobiles and Adaptive Equipment for Certain
Disabled Veterans of the Armed Forces
- 64.116 Vocational Rehabilitation for Disabled Veterans

Select Committee on Indian Affairs:

- 13.228 Indian Health
- 13.534 Indian Education Grants to Local Educational
Agencies
- 13.535 Indian Education - Special Programs and Projects
- 13.536 Indian Education - Adult Indian Education
- 13.551 Indian Education - Grants to Nonlocal Educa-
tional Agencies
- 15.108 Indian Employment Assistance
- 15.109 Indian Education Dormitory Operations
- 15.110 Indian Education - Federal Schools
- 15.130 Indian Education - Assistance to Schools
- 17.234 Indian Employment and Training Programs

HOUSE OF REPRESENTATIVES

Committee on Appropriations:

Subcommittee on HUD--Independent Agencies:

- 14.218 Community Development Block Grants/Entitlement
Grants
- 64.002 Community Nursing Home Care
- 64.007 Blind Veterans Rehabilitation Centers
- 64.008 Veterans Domiciliary Care
- 64.009 Veterans Hospitalization
- 64.010 Veterans Nursing Home Care
- 64.011 Veterans Outpatient Care
- 64.019 Veterans Rehabilitation - Alcohol and Drug
Dependence
- 64.100 Automobiles and Adaptive Equipment for Certain
Disabled Veterans of the Armed Forces
- 64.116 Vocational Rehabilitation for Disabled Veterans

Subcommittee on Interior:

13.228 Indian Health Services
 13.534 Indian Education Grants to Local Educational
 Agencies
 13.535 Indian Education - Special Programs and Projects
 13.536 Indian Education - Adult Indian Education
 13.551 Indian Education - Grants to Nonlocal Educational
 Agencies
 15.108 Indian Employment Assistance
 15.109 Indian Education Dormitory Operations
 15.110 Indian Education - Federal Schools
 15.130 Indian Education - Assistance to Schools

Subcommittee on Labor--Health, Education, and Welfare:

13.210 Comprehensive Public Health Services - Formula
 Grants
 13.211 Crippled Children's Services
 13.217 Family Planning Projects
 13.224 Community Health Centers
 13.232 Maternal and Child Health Services
 13.235 Drug Abuse Community Service Program
 13.237 Mental Health Hospital Improvement Grants
 13.239 Narcotic Addict Rehabilitation Act Contracts
 13.240 Community Mental Health Centers - Staffing and
 Construction
 13.246 Migrant Health Grants
 13.252 Alcohol Demonstration Programs
 13.257 Alcohol Formula Grants
 13.259 Mental Health - Children's Services
 13.266 Childhood Lead-Based Paint Poisoning Control
 13.268 Disease Control - Project Grants
 13.269 Drug Abuse Prevention Formula Grants
 13.284 Emergency Medical Services
 13.290 Special Alcohol Projects
 13.295 Community Mental Health Centers - Comprehensive
 Services Support
 13.397 Career Centers Support
 13.400 Adult Education - Grants to States
 13.427 Educationally Deprived Children - Handicapped
 13.428 Educationally Deprived Children - Local Educa-
 tion Agencies
 13.429 Educationally Deprived Children - Migrants
 13.431 Educationally Deprived Children in State
 Administered Institutions Serving Neglected
 or Delinquent Children
 13.433 Follow-through

Subcommittee on Labor--Health, Education, and Welfare (continued):

- 13.444 Handicapped Early Childhood Assistance
- 13.445 Handicapped Innovative Programs - Deaf-Blind Centers
- 13.449 Handicapped Preschool and School Programs
- 13.482 Special Services for Disadvantaged Students
- 13.488 Talent Search
- 13.492 Upward Bound
- 13.493 Vocational Education - Basic Grants to States
- 13.495 Vocational Education - Cooperative Education
- 13.498 Vocational Education Research
- 13.499 Vocational Education - Special Needs
- 13.502 Vocational Education Innovation
- 13.512 Educationally Deprived Children - Special Incentive Grants
- 13.554 Career Education
- 13.568 Handicapped Innovative Programs - Programs for Severely Handicapped Children
- 13.600 Child Development - Head Start
- 13.612 Native American Programs
- 13.623 Runaway Youth
- 13.624 Rehabilitation Services and Facilities - Basic Support Program
- 13.625 Vocational Rehabilitation Service for Social Security Disability Beneficiaries
- 13.630 Developmental Disabilities - Basic Support
- 13.631 Developmental Disabilities - Special Projects
- 13.632 Developmental Disabilities Demonstration Facilities and Training (University Affiliated Facilities)
- 13.633 Special Programs for the Aging - State Agencies Activities and Area Planning and Social Service Programs (Title III)
- 13.634 Special Programs for the Aging - Title III, sec. 308 (Model Projects on Aging)
- 13.635 Special Programs for the Aging - Nutrition Programs for the Elderly (Title VII)
- Supplemental Security - Vocational Rehabilitation Program
- 13.707 Child Welfare Services (Title IV-B)
- 13.714 Medical Assistance Program - Medicaid (Title XIX)
- 13.748 Work Incentive Program - Child Care-Employment-Related Support Services (WIN)
- 13.754 Public Assistance Social Services
- 13.761 Public Assistance Maintenance Assistance (State Aid)
- 13.762 Refugee Assistance - Cuban Refugees

Subcommittee on Labor--Health, Education, and Welfare (continued):

13.769 Special Assistance to Refugees from Cambodia and Vietnam in the United States

13.771 Social Services for Low-Income Public Assistance Recipients (Title XX)

17.200 Apprenticeship Outreach

17.207 Employment Service

17.211 Job Corps

17.226 Work Incentive Program (WIN)

17.228 National On-the-Job Training

17.230 Farm Workers (migrant and other seasonally employed farm worker programs)

17.232 Comprehensive Employment and Training Programs

17.233 Employment and Training Research and Development Projects

17.234 Indian Employment and Training Programs

17.235 Senior Community Service Employment Program (Title IX)

17.400 Trade Adjustment Assistance Workers

49.002 Community Action

49.005 Community Food and Nutrition

49.010 Senior Opportunities and Services

49.013 State Economic Opportunity Services

72.001 Foster Grandparents

72.002 Retired Senior Volunteer Program (RSVP)

72.003 Volunteers in Service to America (VISTA)

72.008 Senior Companion Program

72.010 Mini-Grants

Subcommittee on Public Works:

23.004 Appalachian Health Programs

23.011 Appalachian State Research, Technical Assistance and Demonstration Projects

23.013 Appalachian Child Development

Subcommittee on State, Justice, Commerce, the Judiciary:

16.517 Juvenile Justice and Delinquency Prevention - Special Emphasis Prevention and Treatment

59.026 Service Corps of Retired Executives and Active Corps of Executives

Subcommittee on Transportation:

20.500 Capital Improvement Grants

20.501 Capital Improvement Loans

20.506 Urban Mass Transportation Demonstration Grants

20.507 Urban Mass Transportation Capital and Operating Assistance Formula Grants

Subcommittee on Transportation (continued):

- 20.600 State and Community Safety Program
- Rural Highway Public Transportation Demonstration Program
- Carpool Demonstration Grants
- Capital Assistance to Private Nonprofit Organizations - sec. 16(b)(2)
- Interstate Transfer Grants
- Urban Systems Grants

Committee on Banking, Finance and Urban Affairs:

- 14.218 Community Development Block Grants/Entitlement Grants

Committee on Education and Labor:

- 13.235 Drug Abuse Community Service Programs
- 13.239 Narcotic Addict Rehabilitation Act Contracts
- 13.400 Adult Education - Grants to States
- 13.427 Educationally Deprived Children - Handicapped
- 13.428 Educationally Deprived Children - Local Education Agencies
- 13.429 Educationally Deprived Children - Migrants
- 13.431 Educationally Deprived Children in State Administered Institutions Serving Neglected or Delinquent Children
- 13.433 Follow-through
- 13.444 Handicapped Early Childhood Assistance
- 13.445 Handicapped Innovative Programs - Deaf-Blind Centers
- 13.449 Handicapped Preschool and School Programs
- 13.482 Special Services for Disadvantaged Students
- 13.488 Talent Search
- 13.492 Upward Bound
- 13.493 Vocational Education - Basic Grants to States
- 13.495 Vocational Education - Cooperative Education
- 13.498 Vocational Education Research
- 13.499 Vocational Education - Special Needs
- 13.502 Vocational Education Innovation
- 13.512 Educationally Deprived Children - Special Incentive Grants
- 13.554 Career Education
- 13.568 Handicapped Innovative Programs - Programs for Severely Handicapped Children
- 13.600 Head Start
- 13.612 Native American Programs
- 13.623 Runaway Youth
- 13.624 Rehabilitation Services and Facilities - Basic Support Program

Committee on Education and Labor (continued):

- 13.625 Vocational Rehabilitation Service for Social Security Disability Beneficiaries
- 13.633 Special Programs for the Aging - State Agencies Activities and Area Planning and Social Service Programs (Title III)
- 13.634 Special Programs for the Aging - Title III, sec. 308 (Model Projects on Aging)
- 13.635 Special Programs for the Aging - Nutrition Programs for the Elderly (Title VII)
- 16.517 Juvenile Justice and Delinquency Prevention - Special Emphasis Prevention and Treatment
- 17.200 Apprenticeship Outreach
- 17.207 Employment Service
- 17.211 Job Corps
- 17.226 Work Incentive Program (WIN)
- 17.228 National On-the-Job Training
- 17.230 Farm Workers (migrant and other seasonally employed farm worker programs)
- 17.232 Comprehensive Employment and Training Programs
- 17.233 Employment and Training Research and Development Projects
- 17.235 Senior Community Service Employment Program (Title IX)
- 49.002 Community Action
- 49.005 Community Food and Nutrition
- 49.010 Senior Opportunities and Services
- 49.013 State Economic Opportunity Services
- 72.001 Foster Grandparents
- 72.002 Retired Senior Volunteer Program (RSVP)
- 72.003 Volunteers in Service to America (VISTA)
- 72.008 Senior Companion Program
- 72.010 Mini-Grants

Committee on Interior and Insular Affairs:

- 13.228 Indian Health Services
- 13.534 Indian Education Grants to Local Educational Agencies
- 13.535 Indian Education - Special Programs and Projects
- 13.536 Indian Education - Adult Indian Education
- 13.551 Indian Education - Grants to Nonlocal Educational Agencies
- 15.108 Indian Employment Assistance
- 15.109 Indian Education Dormitory Operations
- 15.110 Indian Education - Federal Schools

APPENDIX III

APPENDIX III

Committee on Interior and Insular Affairs (continued):

- 15.130 Indian Education - Assistance to Schools
- 17.234 Indian Employment and Training Programs

Committee on Interstate and Foreign Commerce:

- 13.210 Comprehensive Public Health Services - Formula Grants
- 13.211 Crippled Children's Services
- 13.217 Family Planning Projects
- 13.224 Community Health Centers
- 13.232 Maternal and Child Health Services
- 13.237 Mental Health Hospital Improvement Grants
- 13.240 Community Mental Health Centers - Staffing and Construction
- 13.246 Migrant Health Grants
- 13.252 Alcohol Demonstration Programs
- 13.257 Alcohol Formula Grants
- 13.259 Mental Health - Children's Services
- 13.266 Childhood Lead-Based Paint Poisoning Control
- 13.268 Disease Control - Project Grants
- 13.269 Drug Abuse Prevention Formula Grants
- 13.284 Emergency Medical Services
- 13.290 Special Alcohol Projects
- 13.295 Community Mental Health Centers - Comprehensive Services Support
- 13.397 Career Centers Support
- 13.630 Developmental Disabilities - Basic Support
- 13.631 Developmental Disabilities - Special Projects
- 13.632 Developmental Disabilities Demonstration Facilities

Committee on the Judiciary:

- 13.762 Refugee Assistance - Cuban Refugees
- 13.769 Special Assistance to Refugees from Cambodia and Vietnam

Committee on Public Works and Transportation:

- 20.500 Capital Improvement Grants
- 20.501 Capital Improvement Loans
- 20.506 Urban Mass Transportation Demonstration Grants
- 20.507 Urban Mass Transportation Capital and Operating Assistance Formula Grants
- 20.600 State and Community Safety Program
- Rural Highway Public Transportation Demonstration Program
- Carpool Demonstration Grants

Committee on Public Works and Transportation (continued):

- Capital Assistance to Private Nonprofit Organizations - sec. 16(b)(2)
- Interstate Transfer Grants
- Urban Systems Grants
- 23.004 Appalachian Health Programs
- 23.011 Appalachian State Research, Technical Assistance and Demonstration Projects
- 23.013 Appalachian Child Development

Committee on Veterans' Affairs:

- 64.002 Community Nursing Home Care
- 64.007 Blind Veterans Rehabilitation Centers
- 64.008 Veterans Domiciliary Care
- 64.009 Veterans Hospitalization
- 64.010 Veterans Nursing Home Care
- 64.011 Veterans Outpatient Care
- 64.019 Veterans Rehabilitation - Alcohol and Drug Dependence
- 64.100 Automobiles and Adaptive Equipment for Certain Disabled Veterans of the Armed Forces
- 64.116 Vocational Rehabilitation for Disabled Veterans

Committee on Ways and Means:

- Supplemental Security - Vocational Rehabilitation Program
- 13.707 Child Welfare Services (Title IV-B)
- 13.714 Medical Assistance Program - Medicaid (Title XIX)
- 17.400 Trade Adjustment Assistance - Workers
- 13.748 Work Incentive Program - Child Care-Employment-Related Supportive Services (WIN)
- 13.754 Public Assistance Social Services
- 13.761 Public Assistance Maintenance Assistance (State Aid)
- 13.771 Social Services for Low-Income Public Assistance Recipients (Title XX)



ACTION

May 25, 1977

The Honorable Elmer B. Staats
Comptroller General of the
United States
Washington, D.C. 20548

Dear Mr. Staats:

The draft proposed report, "Hindrances to Coordinating Transportation of People Participating in Federally Funded Grant Programs" prepared by the staff of the U.S. General Accounting Office has been reviewed by staff members of the Office of Domestic and Anti-Poverty Operations, ACTION. Their comments are attached.

Sincerely,



Sam Brown
Director

enclosure



1. The Senior Companions Program (SCP) should be added to the list (page 12) of ACTION programs which reimburse clients for transportation expenses.
2. The Senior Companions Program (SCP) was omitted from the list of programs on page 14.
3. We question the statement (page 47) that there are no incentives to coordinate transportation.

Transportation is a very important part of our program activities and our sponsors continuously emphasize "lack of adequate transportation systems and financial resources to pay for transportation" as being a major problem for them.

Given the limited resources which we can make available to sponsors for transportation needs we certainly endorse the concept of transportation resource sharing among various Federal programs and federally funded projects when feasible, providing there is appropriate cost sharing and accountability.

We have and will continue to urge our sponsors to make every effort to coordinate their transportation resources with other Federal, State and local programs in their communities.

4. The study does not deal with transportation issues peculiar to volunteers, particularly older volunteers, e.g.:
 - a. senior or volunteer break on private auto gas purchases;
 - b. flexibility in earmarking special funds or tax deductions for community provider of vans, taxi service or manpower to drive senior volunteers to assignment; and
 - c. federal auto insurance "basic coverage" plan.

[See GAO note, p. 109.]

5. We recommend substituting the attached change in wording from appendix II, page 95 of the draft report, applying to VISTA.

"Funds may not be used to purchase transportation equipment. Recipients of VISTA services are not eligible for transportation services. Grants are made to sponsors for leasing of equipment at the lowest possible rate for on-the-job use of VISTA volunteers, or the volunteers are paid 12¢ a mile for approved use of private vehicles on-the-job, if the project to which they are assigned cannot pay for the transportation."

6. We reviewed the section pertaining to the Mini-Grant Program (page 96) and find that the comment as stated is not entirely correct.

While a Mini-Grant may not exceed \$5,000, no statement is made as to the purchase of transportation equipment. There have been projects where vehicles have been purchased and used for Meal on Wheels, transportation of senior citizens, etc.

GAO note: Page references in this appendix refer to the draft report and do not necessarily agree with the page numbers in the final report.

THE APPALACHIAN REGIONAL COMMISSION
1666 CONNECTICUT AVENUE
WASHINGTON, D.C. 20235

June 8, 1977

OFFICE OF
FEDERAL COCHAIRMAN

Mr. Henry Eschwege, Director
Community and Economic
Development Division
General Accounting Office
Washington, D. C. 20548

Dear Mr. Eschwege:

The Appalachian Regional Commission has completed its review of your draft report, "Hindrances to Coordinating Transportation of People Participating in Federally Funded Grant Programs." This report touches on a timely issue which the Commission has recognized over the last five years as being highly significant in the establishment of rural public transportation systems. The Commission has, as a matter of policy, promoted service consolidation wherever possible in those projects which it has directly supported.

We note that for the case studies four out of the twelve came from the Appalachian Region. One of these, AORTA, has received direct support from the Commission over the last four years. Based on this experience (as well as that gleaned from some thirteen other studies or projects not in your sample), we offer the following comments:

1. Your affirmative stand relative to there being no "explicit statutory or regulatory restrictions which prohibit coordination of transportation" seems somewhat conditioned by the statement on page 31, "we have not (underlining supplied) examined the myriad of Federal grant statues to determine . . . which . . . might preclude . . . (the) furnishing (of) transportation to . . . beneficiaries of another grant program." Whether or not such prohibitions exist, such hindrances as have been identified are as real and formidable as any in a statutory or regulatory form.
 2. While your reports' national perspective gives a more positive cast to the assertion that states and municipalities have shown strong initiatives in bringing about transport coordination, our experience has been somewhat to the contrary. In all three ARC-sponsored operating projects, the brunt
- [See GAO note 1, p. 114.]

of such coordination has fallen upon the project director and/or consultants hired to put the system together. This led to an inordinate amount of project resources (sometimes as much as 50 to 60 percent in the initial two-year start up period) being devoted to "administrative expenses." If the problems are solved at the local level, there is no guarantee that they have even been addressed at the State or Federal levels of government. The advantages in coordination of service are not always so evident to the local project director when he attempts to bring it about. While conceding that such initiatives should start at the local level, consistent and clear Federal policy would help.

3. Many of the identified hindrances are all too familiar to ARC project managers. The administration of Title XX of the Social Security Act, as amended, seems to be the prime offender when it comes to reporting and accounting workloads. Many small systems simply cannot afford to provide such bookkeeping services even if totally funded by the Federal resources because of the data collection and compilation problem. We are aware that there has been an effort to devise a uniform system of accounts for large urban transit systems. However, to the best of our knowledge, no such effort has been made for smaller, less complicated operations. At the present time, each funding agency propagates its own requirements, each varying from the other enough to make implementation at the local level a constant hassle.

4. The length of funding cycle was identified as a specific hindrance and ARC was specifically cited as an example of an agency with such provisions. Without being argumentative or overly defensive we should like to point out that ARC programs are intended to be of a relative short-term demonstration and feasibility type nature. As such, they were never expected to extend ad infinitum into the future but rather demonstrate that certain regional approaches to serving people were practical and worthy of continual local support. As a matter of practical administration, ARC's method of awarding grants and entering into contracts with local sponsors probably has fewer requirements than any Federal program. Contracts are awarded and funds committed on a multi-year basis; advance and progress payments are allowed to responsible sponsors to ease cash-flow problems; and reporting requirements are kept to the absolute minimum.

5. We were struck, as I am sure you were, by the great variety exhibited in even the small sample of case studies covered in the report. This variety in organizational arrangements, funding, and service is both the strength of such operations and the downfall of Federal regulatory efforts. It is extremely important to keep all such efforts, as outlined in your recommendation, clear and simple. The Appalachian Regional Commission would be pleased to participate in such an effort, if it could be of assistance. In addition to the policy/regulatory/accountability approach, the experience of this Commission leads to the following suggestions:

- Placement of the federal coordinative effort should be in the Department of Transportation.
- All funding agency administrative guidelines should contain a requirement to the effect that any sponsor desiring money for transport services as an adjunct to other programs must first conduct an appraisal of existing transport resources.
- The basic responsibility for service coordination resides at the local level provided that adequate funding is granted such activities.
- As an incentive for the formation of coordinated transport service support should be given to HEW's proposed rulemaking allowing client eligibility waivers.
- In order for "social service" type agencies to support service consolidation it is desirable that they be required to develop accurate estimates of all direct and indirect costs (including administrative support - personnel, equipment, and facilities). At present the "perceived" cost of providing transportation to their clientele is below the actual cost, resulting in a reluctance to pay another agency an appropriate fee.
- Local funding is a serious problem, particularly for administrative and operational support, and consideration should be given to expanded Federal support.

--The success of a rural public mass transportation project is highly dependent on the quality of the project director. Basic problems are a lack of qualified persons and a tendency to rely on retired personnel and other unqualified individuals, often paid accordingly. The Department of Transportation should consider coordination, and possibly funding, of appropriate training for prospective managers of these programs. Development of education/experience standards and salary guides might be very helpful in educating local officials.

-- Over two years ago, the Commission abandoned strictly categorical grants in favor of "single allocation" grant to each state. Increased state responsiveness to current issues is fostered by this flexible approach.

6. There is no easy solution to the proliferation of hindering regulations by state administering agencies. However, our experience suggests that as long as a Federal agency speaks with a clear and simple voice, the states are willing to follow suit. The Appalachian Regional Commission will continue to operate on the premise of maximum local autonomy and minimum Federal intervention.

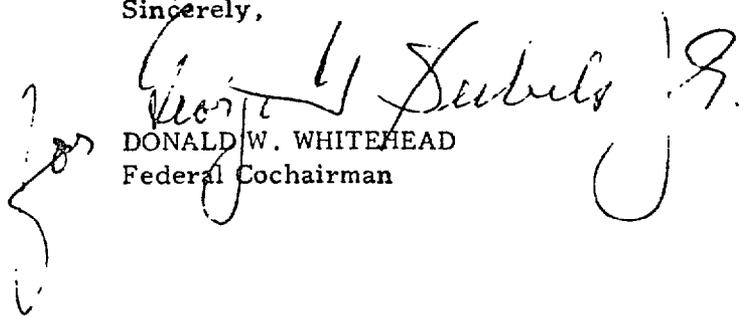
7. The expenditure figures supplied by UMTA somewhat obscures the relative paucity of funds actually going to rural and small urban areas of the country. It was our understanding of this study that the primary emphasis was on the rural and small urban areas. If this is correct, a more exact breakdown of data is needed.

[See GAO note 2, p. 114.]

In a little broader context, has GAO considered the additional savings which might accrue to social service programs by extending the "sharing" concept beyond the transport component? We believe this might merit some serious consideration, in such areas as supply purchasing, lab and testing services, and diagnostic screening.

Again, our thanks for allowing us to review your findings. We trust you find our comments useful.

Sincerely,



DONALD W. WHITEHEAD
Federal Cochairman

GAO notes:

1. Page references in this appendix refer to the draft report and do not necessarily agree with the page numbers in the final report.
2. Material no longer related to this report has been deleted.

Community WASHINGTON, D.C. 20506
Services Administration 

June 9, 1977

Mr. Gregory J. Ahart
Director
Human Resources - United
States General Accounting
Office
411 "G" Street, N. W.
Washington, D. C. 20548

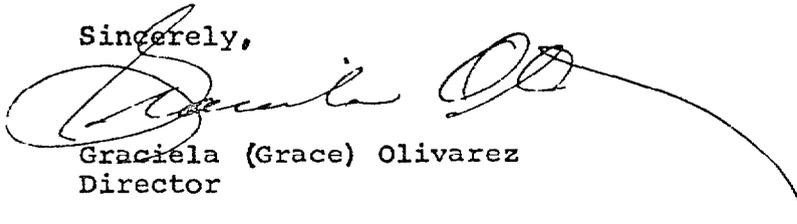
Dear Mr. Ahart:

Attached are comments of the Community Services Administration (CSA) on the Draft Report, "Hindrances to Coordinating Transportation of People Participating in Federally Funded Grant Programs," prepared by the General Accounting Office, as well as our copies of the report.

In general, given the time committed by the General Accounting Office (GAO) and ourselves a more thorough analysis of the problem and a detailed and practical strategy for addressing it had been anticipated.

We appreciate the opportunity to comment, and hope that our views may be useful to you in your further consideration of this problem which has such direct impact on the day to day lives of the nations poor and disadvantaged.

Sincerely,



Graciela (Grace) Olivarez
Director

COMMENTS: GAO DRAFT REPORT: HINDRANCES TO COORDINATING TRANSPORTATION
OF PEOPLE PARTICIPATING IN FEDERALLY FUNDED
GRANT PROGRAMS

The Senate Committee on Public Works requested GAO to identify:

- (1) Federal programs which provide for the transportation of program beneficiaries in rural and small urban areas;
- (2) any restrictions which frustrate efforts to coordinate these various transportation resources;
- (3) instances in which coordination has been achieved and the circumstances which made this possible.

The report concludes that the most significant hindrance seems to be confusion at all levels of government about the extent to which Federally funded projects may engage in transportation coordination. The report proceeds to assert that "GAO believes that coordination of various Federally funded transportation resources is desirable to the extent it is feasible providing there is appropriate cost sharing and accountability." Recommendations for accomplishing this include endorsements of the concept; development of administrative regulations which will facilitate information gathering and coordination potential; and issuance of regulations and guidance to clarify and streamline procedures for cost-sharing and reimbursement.

In general, the Community Services Administration does not im-⁴ within the report the sense of urgency consistent with the seriousness of the problem either in terms of its impact on the rural disadvantaged population or in

terms of its effect on the energy emergency in the country.

This perspective of the CSA derives directly from the experience of its 879 local Community Action Agencies, 444 of which are rural and operate a variety of Federally funded human services and community development activities in their multi-county jurisdictions. The local CAA mandate for provision of adequate transportation services, and indeed, for the development of coordinated transportation services, is not based on a categorical identification of transportation as a national or special emphasis activity, but is contained in the general, broad purposes of the Economic Opportunity Act, as amended, and expressed in the general standards of effectiveness for all projects:

- 1) Strengthened community capabilities for planning and coordinating so as to insure that available assistance related to the elimination of poverty can be more responsive to local needs and conditions.
- 2) Better organization of services related to the needs of the poor.
- 3) Maximum feasible participation of the poor in the development and implementation of all programs and projects designed to serve the poor.

Provision of adequate and effective transportation systems in rural areas is further implied by the declaration that the policy of the Agency is "to enable the poor living in rural areas to remain in such areas and become self-sufficient therein"



A 1975 sample survey of Community Action Agencies provides a rough sketch of CAA experience in transportation efforts. For all CAAs, the projected expenditure for transportation was nearly \$13 million, of a total funding of nearly \$1.6 billion. Of the \$13 million expended by all CAAs, nearly \$8 million was used for transportation by rural CAAs. Among all CAAs, transportation was the activity with the third highest number of direct participants, and the lowest average cost per participant. Also among all CAAs, 31% of the funds used the support transportation activities came from CSA, and a nearly equal 29% came from other Federal sources. It should be pointed out that the above figures may not reflect the entire involvement of CAAs in transportation activities because some program activities, such as energy, include transportation as a sub-category, which has not been specifically identified in this body of data. The transportation experience evidenced by this information is further confirmed by the fact that of the twelve local projects described in the GAO Draft Report, seven are either operated by CAAs or use CSA funds.

The substantial Agency involvement in this general effort can be attributed to the fact that lack of transportation is a major barrier to getting services to people and people to services in rural communities. Given the low population density, the broad geographic dispersion of people, and the disproportionate share of elderly and children in rural areas, it is not surprising that a 1976 HEW study, "Getting Human Services to People in Rural America" found that no other single hindrance to service delivery was as frequently mentioned.

We feel that a problem of this magnitude deserves an analysis more acute than one which reveals "confusion" as the principal reason for lack of coordination. Unless the sources of this confusion are carefully and accurately detailed, and then systematically eliminated, we are not hopeful of improvement in the situation.

CSA disappointment at the superficial treatment of this problem and the lack of a clear practical plan for addressing it, is exacerbated by our interest in the energy needs of the poor. Certainly, the lack of transportation coordination, and the concomitant waste of precious resources, deserves a more thorough analysis and a more thoughtful management strategy.

Within the Executive branch, it seems obvious that the Office of Management and Budget would have lead responsibility for developing the plan to eliminate the administrative sources of the identified confusion. The Community Services Administration, would recommend the following as possibly useful elements in a serious Federal management strategy:

- 1) Adopt a single definition of persons in the category of the "transportation disadvantaged," to include all individuals unable to achieve basic mobility on their own, disregarding the source of their disadvantage. The term would include such diverse groups as the elderly, the poor, blind, disabled, etc., and could therefore be used in all administrative procedures and regulations governing transportation components of Federal programs.



- 2) Mandate uniform procedures regulations for transportation services, including vehicle acquisition, cost-sharing, etc. in a manner similar to the uniform reporting standards which were handled through FMC 74-7, and OMB Circular A-110.
- 3) Require among Federal agencies, preferential or bonus-point treatment in funding review, for projects which accomplish their transportation requirements as part of a coordinated system, either their own or through some other local provider.
- 4) Designate transportation providers for local jurisdictions, much as area-wide clearinghouses have been designated. Transportation providers would either provide the transportation out of pooled resources themselves, or assure the establishment of a third party transportation provider. We would, of course support, the designation of CAAs in rural areas, although there are certainly other alternatives.
- 5) Eliminate the proliferation of transportation authorities within Federal programs by replacing this subcategory with formula systems that include a factor for geographic dispersion of client population. Thus, transportation to services would become a regular part of the support for a program; the need for permanent subsidy in rural areas would be recognized; and program costs would automatically include the real cost of transportation services.



DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20201

August 3, 1977

Mr. Gregory J. Ahart
Director, Human Resources
Division
United States General
Accounting Office
Washington, D.C. 20548

Dear Mr. Ahart:

The Secretary asked that I respond to your request for our comments on your draft report entitled, "Hindrances to Coordinating Transportation of People Participating in Federally Funded Grant Programs." The enclosed comments represent the tentative position of the Department and are subject to reevaluation when the final version of this report is received.

We appreciate the opportunity to comment on this draft report before its publication.

Sincerely yours,

Thomas D. Morris
Inspector General

Enclosure

COMMENTS OF THE DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE ON
THE GENERAL ACCOUNTING OFFICE DRAFT REPORT, "HINDRANCES TO CO-
ORDINATING TRANSPORTATION OF PEOPLE PARTICIPATING IN FEDERALLY
FUNDED GRANT PROGRAMS"

GENERAL COMMENTS

Before discussing specific concerns with the draft report, we commend the GAO for its investigative efforts and developmental objectives to improve the categorical fragmentation and inefficient use of transportation resources at the sub-state level.

The Department is fully sensitive to the need for bringing about greater operating efficiencies and service effectiveness in our transportation service delivery activities. All too often the many independent categorical transportation operations result in duplicative expenditures and services; failings to serve broader vulnerable populations; notable losses of agency manpower to the provision of such services; and in general failing to realize the benefits of existing local resources. One approach now being posited as best able to overcome these service deficiencies is the coordination and/or consolidation of existing local resources at the local level.

There is general agreement among most Federal agencies that coordination activities should result in a reduction in transportation related agency expenses and an increase in the level of services available for agency related purposes. Some HEW and DOT agencies have developed this premise as program policy transmitted to state and local counterpart agencies. Despite this, there is wide-spread agreement that the most significant barrier to a much broader and a working commitment to transportation coordination at all agency levels is the existence of little empirical or statistical evidence to support perceptions of coordination benefits. The few coordinated systems which do exist, some of which are referenced in the draft report, are considered to be situationally unique, involving, for instance, excessive Federal, state, and local funding to initiate and sustain the coordinated system, and generally failing to provide valid models of coordinated services which could be replicated in other local settings.

For the purpose of developing a national knowledge base on transportation coordination, the Office of Human Development (OHD) initiated a two year program to demonstrate the feasibility of coordinating existing social service transportation. The award of OHD's demonstration grants in June, 1977, is a culmination of nearly two years of

extensive groundwork preparations, inter-Departmental collaboration, and research (generating products referenced, and drawn from, in the development of the draft GAO report). These activities were found to be necessary as nearly all studies to date which consider transportation coordination have emphasized the problems associated with achieving coordination, rather than the process by which coordination can be achieved. In addition, OHD's efforts have drawn extensively from resources at the central, regional, and local level of HEW and DOT agencies. It is now agreed by both Departments that the OHD Transportation Demonstration Program will provide the needed findings to begin formulating policy to link HEW-funded transportation services with each other, as well as with those of other Federal departments and agencies.

OHD has identified ten generic models of coordinated/consolidated transportation activity which we now believe represent the full spectrum of approaches feasible at the local level. These models take into account both management coordination such as billing, accounting, funding, outreach activities, as well as operational coordination through client ride-sharing and vehicle time-sharing activities. These models jointly developed by HEW and DOT and their implementation between social service agencies, public transit agencies, and private transportation providers, are being fully tested through the OHD demonstration program. Without this effort, we are unable to know the advantages or disadvantages of coordination or hindrances to the process.

TECHNICAL COMMENTS

We regret that GAO's reporting of the OHD program was not more complete with respect to its nature, intent and Federal-wide implications. We would suggest that GAO's observation that "there has been no coherent interagency effort at the national level to tackle the specific coordination issue of transportation resources or to try to eliminate hindrances" should be modified in view of this substantial effort.

ISSUES

Overall, we believe the draft GAO report could have a clearer focus, and would strongly recommend reconsideration of the conclusions and proposals reflected in the draft.

We understand the objectives of this study to be the identification of Federal programs which fund transportation services, examination of both legislative and administrative restrictions to Federal, State and local level coordination between these program activities; identification of circumstances which have in the past made coordination possible; and recommendations for the elimination of Federal restrictions to coordination.

In response to these objectives, we believe it will be essential for GAO to provide a more comprehensive and operational definition of the concepts of transportation coordination and consolidation than: "pooling or sharing of transportation resources by several different recipients of Federal funds from more than one categorical program." We do not concur with the implication in the draft report that transportation coordination will result in better use of resources and delivery of transportation services. As we have indicated, there is little evidence to support this position. Without further examination, we fear that coordination efforts resulting from such general endorsements as proposed in the draft report could potentially jeopardize existing services and any future potentials for achieving effective coordination.

Likewise, we are unable to agree with GAO's methodology and findings regarding hindrances to coordination without first knowing on what basis of coordination these hindrances were identified and examined. We know barriers to exist beyond those identified in the draft report. More important, however, the relative severity and prioritization of these hindrances is unclear without first-hand observation and analysis. Although our findings to date would tend to parallel GAO's, there is little known about the exact scale and impact of existing legislative, administrative, and attitudinal barriers, and the degree to which coordination of local services would be stimulated as a result of their removal. Thus, the single most important barrier to coordination is the relatively poor knowledge about transportation coordination/consolidation. For instance, without first knowing the real benefits to be derived from coordination, we believe that the fears and suspicions which exist at the local level, as discussed in the draft report, are entirely justifiable.

We are also concerned that the draft report does not examine the need for improving social service operations (reasons why DHEW has been forced to engage in the transportation business), but tends to concentrate on social service agency coordination as an area of major need. Instead, we believe that improvements to the coordinated delivery of public transportation (in meeting the needs of social service agencies as a part of their "public" constituency) is an issue central to any discussion of transportation coordination.



DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WASHINGTON, D.C. 20410

May 31, 1977

OFFICE OF THE ASSISTANT SECRETARY
FOR COMMUNITY PLANNING AND DEVELOPMENT

IN REPLY REFER TO:

Mr. Henry Eschwege
Director, Community and Economic
Development Division
General Accounting Office
Washington, D. C. 20548

Dear Mr. Eschwege:

Thank you for the opportunity to comment on the draft GAO Report titled "Hindrances to Coordinating Transportation of People Participating in Federally Funded Grant Programs." The report vividly illustrates how a relatively minor component of many programs can prove duplicative when viewed as a totality. OMB provision for cost-sharing arrangements can help eliminate part of the problem.

Coordination at the national level, however, short of identifying only a few selected programs from which Federal funds would be made available, becomes a problem. This is especially true for the Community Development Block Grant Program since the transportation services aspects are only a minor part of the total program. If current information on all 114 Federal programs has to be maintained regarding transportation services assistance as indicated on page 67 and the coordination of this information takes place at the national level, the paper work alone makes the proposal unworkable.

It is suggested that the report be made more explicit concerning solutions to the coordination problem. Two solutions which might warrant further exploration involve:

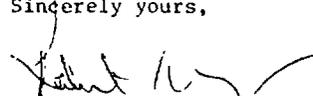
1. Limitation on the number of Federal programs that can provide such services. Four or five Federal programs might be identified that are highly oriented to the provision of transportation services. If they were to be the sole source of funding for such purposes, coordination activities would be greatly simplified. Funding levels for such programs would have to be modified to reflect the increased demand for funds.

[See GAO note, p. 126.]

2. If the provision of transportation services is to continue to be provided by the 114 programs, it is suggested that the coordination take place at the local level since fewer programs would need to be considered. This could be done by requiring each community desiring assistance to have a transportation services program. One or a few selected Federal programs could be designated for providing Federal assistance for the preparation of such a program, and all grant requests for transportation services from a community would have to show consistency with the local program and the coordination arrangements in effect. Cost-sharing between Federal agencies could then be worked out on the basis of the community-wide or area-wide program. The Department of Transportation would logically be the coordinator of this effort. Funds could be made available through UMTA for the preparation of a program such as transportation services for urban areas. Based on UMTA experience in this area, a similar program might be worked out for the rural areas. An Executive Order would have to be issued directing the Federal agencies to establish a transportation services program requirement for each of the 114 programs unless legislatively prohibited. In these instances, Congress would have to enact the necessary enabling legislation.

I realize the magnitude of the task you have undertaken. Through the provision of more explicit recommendations, the report will prove more useable to both the Congress and the Federal agencies. The opportunity to comment is appreciated.

Sincerely yours,



Robert C. Embry, Jr.
Assistant Secretary

GAO note: Page references in this appendix refer to the draft report and do not necessarily agree with the page numbers in the final report.



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

Ma, 20, 1977

Mr. Gerald E. Killian
Assistant Director, Community and
Economic Development Division
U.S. General Accounting Office
Room 7105
400 7th St., SW
Washington, D.C. 20590

Dear Mr. Killian:

Confirming our discussion, please be advised that the Department has no comments to offer on your draft report "Hindrances to Coordinating Transportation of People Participating in Federally Funded Grant Programs." There was no coverage of Departmental programs in the report and the situations discussed do not coincide with those experienced in the Department.

Sincerely,

Program Audit Manager
Office of Audit and Investigation





UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

May 24, 1977

Address Reply to the
Division Indicated
and Refer to Initials and Number

Mr. Victor L. Lowe
Director
General Government Division
United States General Accounting Office
Washington, D.C. 20548

Dear Mr. Lowe:

This letter is in response to your request for comments on the draft report titled "Hindrances to Coordinating Transportation of People Participating in Federally Funded Grant Programs."

The subject matter of this report addresses most directly the program responsibilities of other executive agencies with respect to the transportation of people under Federal grant programs. The eventual adoption of the report recommendations would not significantly impact on this Department's operations. However, we recognize the potential for transportation coordination among federally funded projects and would be prepared to assist in providing any information or data required to implement such a coordination initiative.

We appreciate the opportunity given us to comment on the draft report. Should you have any further questions, please feel free to contact us.

Sincerely,

Kevin D. Rooney
Assistant Attorney General
for Administration



U.S. DEPARTMENT OF LABOR
OFFICE OF THE ASSISTANT SECRETARY FOR ADMINISTRATION
WASHINGTON, D.C. 20210



May 27, 1977

Mr. Gregory J. Ahart
Director
Human Resources Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Ahart:

This is in response to the draft report of April 28, 1977, entitled "Hindrances to Coordinating Transportation of People Participating in Federally Funded Grant Programs."

Our comments are limited to the section regarding the Federal Regional Councils (FRCs). This section indicates that FRC implementation of its responsibilities for coordinating OMB Circular A-95 activities in the field has been "hampered" by limited staffing and inconsistent commitment by Federal agencies to FRCs.

In addition, the Comptroller General's report, GGD 75-52, of February 11, 1975, entitled "Improved Cooperation and Coordination Needed Among All Levels of Government-- Office of Management and Budget Circular A-95", concluded that OMB had devoted only limited staff to administering the Circular which resulted in passive compliance monitoring on the part of OMB, and the issuance of varying regulations and procedures on the part of the Federal agencies.

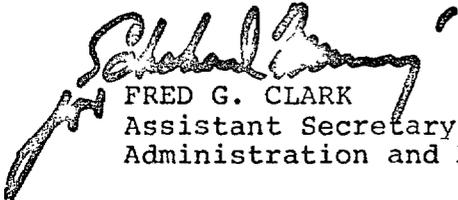
The 1975 report recommended that OMB adopt an aggressive system of positive monitoring of the Circular's administration; and provide the FRCs with the necessary staff to carry out the monitoring role in the field.

Two current Congressional bills would strengthen the A-95 process considerably. One, H.R. 14740, is designed to provide for regular distribution of current Federal program information to members of Congress, State and

local officials as well as the general public. A pending Senate bill, S. 892, would amend the Intergovernmental Cooperation Act of 1968. In each instance, the A-95/Treasury Circular 1082 process would play a key role in providing the basis for information sharing and improving intergovernmental relationships.

We appreciate the opportunity to comment on this report. If we can be of further assistance, please feel free to contact us.

Sincerely,



FRED G. CLARK
Assistant Secretary for
Administration and Management



OFFICE OF THE ADMINISTRATOR

U.S. GOVERNMENT
SMALL BUSINESS ADMINISTRATION
WASHINGTON, D.C. 20416

May 16, 1977

Mr. Henry Eschwege
Director, Community and Economic
Development Division
United States General Accounting Office
Washington, D. C. 20548

Dear Mr. Eschwege:

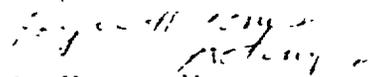
This is in response to your April 28, 1977, letter which requested our comments on your draft report entitled, "Hindrances to Coordinating Transportation of People Participating in Federally Funded Grant Programs."

We have reviewed the subject report and offer the following comments:

As cited in the report, our SCORE and ACE Program would be the only program affected by this report; however, we believe that this program should be exempt from any coordinated transportation effort. As you are aware, the SCORE and ACE volunteers provide management counseling to owners and managers of small businesses, usually at the place of business. Therefore, their travel does not necessarily follow established routes nor are they on rigid schedule. Also, many times the volunteers will travel to another city and will counsel several businesses during the day. These businesses are not usually within walking distance of each other; therefore, some type of transportation is needed, which may not be available under a coordinated effort. We do encourage SCORE and ACE volunteers to use public transportation in those areas where it is feasible.

We appreciate the opportunity to comment on this report and if you need additional information, please advise.

Sincerely,



A. Vernon Weaver
Administrator



OFFICE OF THE SECRETARY OF TRANSPORTATION
WASHINGTON, D.C. 20590

ASSISTANT SECRETARY
FOR ADMINISTRATION

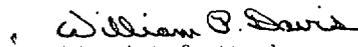
July 1, 1977

Mr. Henry Eschwege
Director
Community and Economic Development Division
U.S. General Accounting Office
Washington, D.C. 20546

Dear Mr. Eschwege:

We have enclosed two copies of our reply to the General Accounting Office draft report "Resources to Coordinating Transportation of People Participating in Federally Funded Programs." Please let us know if we can assist you further.

Sincerely,


Edward W. Scott, Jr.

Enclosures

DEPARTMENT OF TRANSPORTATION REPLY

TO

GAO DRAFT REPORT

ON

HINDRANCES TO COORDINATING TRANSPORTATION
OF PEOPLE PARTICIPATING IN FEDERALLY
FUNDED PROGRAMSSUMMARY OF GAO FINDINGS AND RECOMMENDATIONS

In the report, GAO identifies the following hindrances to transportation coordination efforts:

1. The inherent problems with the categorical approach to Federal assistance;
2. Grantee worries about the availability of continuous funding;
3. Incompatibility or perceived incompatibility due to differences in client groups (age, income, and so forth), and differences in transportation needs of client groups;
4. Personality conflicts, turf protection, and concern that one's clients may be adversely affected by coordination;
5. Transportation regulation;
6. Accountability, paperwork, and bookkeeping problems;
7. Lack of any concerted Federal effort to coordinate transportation.

It appears that the most significant hindrance is confusion at all levels of government about the extent of coordination federally-funded projects may engage in, and that the above mentioned hindrances may be an outgrowth of this confusion.

The report recommends that:

1. Congress endorse the concept of transportation resource sharing;
2. The Office of Management and Budget develop and issue regulations to facilitate transportation coordination.

POSITION STATEMENT

The general recommendations are necessary, but they do not contain sufficient steps to ensure nationwide coordination of specialized transportation. The report's final recommendations ignore observations and suggestions for improving coordination made by persons interviewed by GAO (see pages 60-62). In addition, the report fails to explain why GAO believes that many of the proposed solutions are not administratively feasible or practical (page 65).

Our experience confirms the report's findings that, though there are no explicit statutory or regulatory prohibitions on transportation coordination, a myriad of practical hindrances discourage coordination. In general, GAO has done a creditable job in identifying those obstacles and we concur in the basic recommendations of the draft report. GAO may wish to consider expanding the recommendations to OMB to include a determination of cost allocations between agencies. At the same time, it may wish to recommend that UMTA, FHWA, and other relevant Federal agencies work jointly with OMB to develop cost determination and allocation techniques and to anticipate implementation barriers associated with their use.

In the final recommendations, emphasis is on the area of cost accountability, almost to the exclusion of concerns presented in the body of the report regarding protection of the interests of varying client groups. For example, on page 54 of the draft report, the Federal Regional Council in Region IV envisions "a system that ensures fiscal accountability of program dollars, and service accountability for each target group." "Service level accountability" is of special interest to those individuals and agencies concerned with the provision of transportation for elderly and handicapped persons.

The report creates the impression that no Federal attention was given to the problem of transportation coordination in rural areas until 1975. In administering Section 147 of the Federal-Aid Highway Act of 1973, FHWA and UMTA worked closely with representatives of other Federal agencies in developing program procedures and selecting demonstration projects. Further, the program regulations listed 10 criteria for selection, five of which concerned coordinating services and financial resources.

While we recognize that most of the 106 demonstration projects are in the early operating stages, their impact on local coordination efforts and influence as models for other areas should not be minimized. In fact, three of the GAO case studies cited for positive coordination efforts received Section 147 funding specifically to demonstrate the potential for transportation brokerage (third-party) service.

[See GAO note 1, p. 137.]

The report would benefit from insertion of clarifying language that would identify the transition from text identifying "114 programs that provide transportation for people" to that portion of the report dealing with response to the Senate Committee on Public Works request to identify programs which provide for the transportation of program beneficiaries in rural and small urban areas, and their coordination or lack thereof.

An example of confusing text is found on pages 2 and 8 of the draft report. On page 2 there is an indication that the Committee wanted an identification of "all federal grant and assistance programs which make available federal funds for transportation of people within rural and small urban areas and between there and urbanized areas." On page 8 of the report, \$1.9 billion in DOT programs (or 95% of total DOT obligations under UMTA capital grants) is identified as applicable to the provision of funds for the transportation of people. The inclusion of the total UMTA capital grant program (page 93) in that category is improper and misleading in aggregating the cost of providing transportation services in rural and small urban areas.

The concept and definition of coordination in the report is currently limited to the sharing of transportation vehicles funded by several programs. The definition should be expanded to include the bringing together in some sort of common action, or the acting together in a concerted way, of separate transportation providers and human resource agencies, to provide for the smooth, efficient integration and operation of the overall transportation system. *

It might be helpful if the report would encourage agency officials to go on record in support of the concept of coordination.

The most successful models presented among the examples of existing coordination attempts were those of third party providers, often created under the pressure of State mandate. Although suggestions regarding the formation of third party transportation systems from which all social service organizations would purchase service appear in Chapter 4, under "Suggestions to Eliminate Hindrances," such systems are not given detailed consideration in the conclusions and recommendations in Chapter 5. GAO may wish to include a further analysis of the merits of this approach in the final report. The analysis should take into consideration present funding mechanisms available for such providers and identify if possible gaps in funding availability, as for example, for non-urbanized areas under 50,000 population.

* Institute of Public Administration, Coordinating Transportation for the Elderly and Handicapped, (Washington, D.C.: U.S. Department of Transportation, Urban Mass Transportation Administration, November 1976), p. 13.

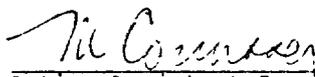
In those cases where coordinated programs have been developed, the key has been a promoter or entrepreneur at the local level who personally took charge of the project--the Fare Free System (page 20) had Jack Salvesson, the Appalachian Ohio Regional Transit Authority (page 17) had Dave Vaughn, the Older Adults Transportation Service (page 21) had Pete Shauer. This role for system leaders is touched on in the discussion on page 50, but needs to be stressed much more. In particular, middle federal managers should establish some incentives in their programs to encourage this kind of entrepreneurial action at the local level.

The draft report does not, and probably cannot, address the matter of coordination of resources within the same department, or between departments within the same agency. The report also does not consider many potentially significant coordination solutions, e.g. streamlining of cumbersome waiver procedures; joint funding simplification; possible improvements in State and local transit regulatory commissions, the ICC, the transportation insurance industry, and other institutions that inhibit coordination; encouraging maximum use of existing public and private transportation operators by social service agencies; and constructive involvement of organized labor to reduce the costs and increase management flexibility of special services.

Before the preparation of the final GAO report, it may be beneficial to solicit a comment from the General Services Administration which operates local motor pools for provision of general auto transportation under its various regional offices throughout the country. It is perhaps feasible to plan to utilize this nucleus of coordinated auto/bus procurement, operation, and maintenance in an expanded role and thus secure economies of scale and central control over the scattered, individual auto usage cited in the report.

Attached are technical comments (Attachment A) and editorial comments (Attachment B).

[See GAO note 2.]


Acting Assistant Secretary for
Environment, Safety, and
Consumer Affairs

GAO notes.

1. Page references in this appendix refer to the draft report and do not necessarily agree with the page numbers in the final report.
2. Attachments have not been included in the final report.



VETERANS ADMINISTRATION
OFFICE OF THE ADMINISTRATOR OF VETERANS AFFAIRS
WASHINGTON, D.C. 20420

June 21, 1977

Mr. Gregory J. Ahart
Director, Human Resources Division
U. S. General Accounting Office
441 G Street, N.W.
Washington, DC 20548

Dear Mr. Ahart:

We have reviewed the draft report, "Hindrances to Coordinating Transportation of People Participating in Federally Funded Grant Programs," dated April 28, 1977, and offer our comments:

Coordinating and combining transportation facilities provided beneficiaries of Federal programs is a desirable goal which we endorse. Unfortunately, the Veterans Administration (VA) programs, in both the Department of Medicine and Surgery (DMSS) and the Department of Veterans Benefits (DVB), fall in the category of having little or no potential for increased coordination of transportation services.

They meet the criteria contained in Chapter Two of the report. The programs do not fund transportation projects per se; they do not establish and pay for the administration, operation and capital cost of vehicles; they reimburse clients for use of their automobiles or for taxicab fares, or provide bus tokens or use project staff to transport clients. Transportation is provided on an individual, unscheduled, reimbursable basis, to destinations which vary from trip to trip.

The beneficiary transportation program in DMSS is conducted essentially on an after-the-fact basis. Individuals are reimbursed for the cost of specified travel previously performed. This concept is based on the laws we administer.

In addition, recent amendments to 38 U.S.C. 111 prohibit, in most instances, travel reimbursement exceeding the cost of the most economical mode of local public transportation. We believe the Congress intended, through this restrictive provision, to promote the use of public transportation to a greater degree.

In the past, DMSS has successfully negotiated the use of Military Airlift Command and U.S. Coast Guard Aircraft to transport certain patients who require specialized forms of air transportation. However, these arrangements have not been wholly satisfactory because of very restrictive availability. Office of Management and Budget Circular A-76 prohibits the Government from competing against the free market for services. Therefore, all possibilities for such specialized air transport from commercial sources must be explored before seeking assistance from the Military Airlift Command.

In DVB's vocational rehabilitation program, veterans are not transported for rehabilitation services in government vehicles, but perform required travel on their own and are reimbursed. Travel funds for counseling and training purposes are not for ongoing travel, but for one-time or, at most, several services. Counseling is usually completed in from one to several sessions, and is scheduled on an individual basis. Daily or other regular travel to and from the place of training is not provided or paid for by the VA, but is paid by the veteran from a monthly subsistence benefit or other income. When vocational rehabilitation training requires travel within a regional office territory or transfer to another regional territory, VA pays the one-time transportation cost, and again this is an individual situation.

In summary, the concept of sharing transportation resources has merit. However, the majority of our patient transportation is provided by commercial sources, or the patient is reimbursed for travel expenses. The only direct transportation capability maintained at some of our health care facilities consists of automobiles, wheelchair ambulant vehicles or ambulances used to transport patients who are unable to use public transportation, to and from facilities for outpatient care, or for transfer to another facility for specialized treatment. Use of any other vehicles maintained is limited to the conduct of essential facility business. Adding transportation capability for the sole purpose of participating in a community project would be inappropriate.

we appreciate the opportunity to review this report.

Sincerely,



MAX CLELAND
Administrator

Interstate Commerce Commission
Washington, D.C. 20423

OFFICE OF THE CHAIRMAN

May 31, 1977

Mr. Henry Eschwege
Director
Community and Economic Development
Division
United States General Accounting Office
Washington, D. C. 20548

Dear Mr. Eschwege:

This refers to your request of April 28, 1977, for comments on Volume I of the proposed report from the General Accounting Office to the Senate Committee on Public Works entitled "Hindrances to Coordinating Transportation of People Participating in Federally Funded Grant Programs."

We have no comments for the first three chapters of the proposed report. In Chapter IV, page 45, "Transportation regulation," a review of the informal opinion from the Commission's Section of Motor Carriers requires a reversal of the position stated therein. It is established by Commission decision that Federally funded State agencies who engage in interstate for-hire passenger transportation are common carriers by motor vehicle within the meaning of Section 203(a)(14) of the Interstate Commerce Act (49 U.S.C. 303). See Mercer County Improvement Authority, 109 M.C.C. 795. While not explicitly stated, it is clear from a reading of Mercer that the passengers would be charged fares, in which can be found the element of compensation.

It is now the view of this Commission that a Federally funded entity which performs transportation for certain disadvantaged persons, for which no fare is charged, is not engaged in for-hire transportation, since the necessary element of compensation is absent. The fact that the transporter is funded by the Federal Government does not appear relevant, since the funds are not furnished by those who are using the transportation service. The fact that certain of the users of the service are taxpayers does not appear to affect this conclusion, since the relationship between payment of taxes, which are commingled with other Federal revenue, and the expenditure of such revenue in the form of transportation subsidies is too remote. In addition, since the operations are not for-hire carriage, and no compensation is received from the passengers themselves, the question of whether the carrier's employees are paid or volunteer is of no consequence in this matter.

[See GAO note, p. 141.]

In Chapter V, "Conclusions and Recommendations," the Commission does not agree that transportation regulation, as cited on page 64, is a hindrance, since as discussed above, those carriers receiving Federal funds, but no compensation from their passengers, are not now subject to regulation by this Commission.

The Commission agrees with the recommendation made, especially those directed to the various Federal departments and agencies. The recommendation to Congress seems also especially appropriate in view of the lack of coordination and consequent overlapping of expenditures in these programs. The recommendation to the Director of the Office of Management and Budget would, if implemented, bring about the coordination of both fundings and programs in this area.

Thank you for the opportunity to review and comment on this proposed report.

Sincerely yours,



A. Daniel O'Neal
Chairman

COMMISSIONER MURPHY was of the opinion that while the statements at sheets 45-46 and 64 of the GAO draft were not necessarily inaccurate that given the limited factual situations presented, a reversal of the informal opinion was inappropriate. For example, it appears that much of the transportation is intrastate and thus beyond this Commission's jurisdiction. A better approach would be to seek a formal ruling by way of petition or rulemaking presenting specific factual data in order to resolve any possible controversy.

COMMISSIONERS GRESHAM and CHRISTIAN were absent and did not participate.

GAO note: Page references in this appendix refer to the draft report and do not necessarily agree with the page numbers in the final report.



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

June 9, 1977

Honorable Elmer B. Staats
Comptroller General of the United States
General Accounting Office
Washington, D.C. 20548

Dear Mr. Staats:

This is in reply to the draft report, "Hindrances to Coordinating Transportation of People Participating in Federally Funded Grant Programs."

The draft report concludes that no statutory or regulatory restrictions were identified which prohibit coordination of transportation resources. It then goes on to recommend that the Office of Management and Budget issue regulations to provide guidance to grantees concerning sharing of their transportation resources. The recommendation appears to be based on assumptions, rather than on evidence that current transportation activities are not being properly coordinated. Further, the report acknowledges that no attempt was made to evaluate whether coordination of transportation would be more efficient. Before considering detailed regulations in this area, we would have to see more documentation of the need for, and feasibility of, coordinating these services.

There are several other questions regarding the draft report. One involves the magnitude of transportation services that possibly could be coordinated or consolidated. The draft report cites \$2.2 billion as the estimated transportation cost of the programs examined, but this total appears to contain instances where the transportation services in the program could not be readily coordinated with other programs. In order to put the problem in its proper perspective, it would be helpful to know the number and dollar value of programs where there is potential for coordination of transportation services.

We were disappointed, after the substantial amount of work that apparently went into the draft report and the twelve case studies that accompanied it, that a hypothetical example was used to illustrate how transportation services

